



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Name:

West Point Apartments

Responsible Entity:

City of Tucson Housing and Community Development Department

Preparer:

Glenn Fournie, Project Coordinator

Certifying Officer Name and Title:

Sally Stang, Director Housing and Community Development Department

Grant Recipient: **La Frontera Partners Inc.**

Direct Comments to:

Glenn Fournie, 520-837-5408 glenn.fournie@tucsonaz.gov

Date:

September 2016

Project Location:

10 E. Broadway Boulevard, Tucson Pima County Arizona 85701. Pima County Assessor parcel numbers: 117-13-0390.

Statement of Purpose and Need for the Proposal: [40 CFR 1508.9(b)]

There is little to no permanent affordable housing located in or near downtown Tucson that serves the low-income population. The project is located in the Tucson Downtown Core, an Infill Incentive District, which is rapidly developing due to the new street car line and where a number of new businesses have opened. Recent studies indicate that in Transit Oriented Development (TOD) communities, high capacity transit and transit stations, such as the Sunlinks Tucson Modern Streetcar and the Ronstadt Transit Center, significantly reduce per capita automobile travel.

The project is consistent with the City of Tucson Consolidated Plan (**Plan Tucson**) policies and goals to develop supportive housing including: 1) New construction and/or rehabilitation of rental units for target populations; 2) Complexes serving special target populations where, in this case, 100% of the units are designated for low-income households; 3) The preservation of existing lower income housing and/or increasing the supply of lower income housing; and 4) Self-sufficiency in lower income households. This project also supports the strategy for helping people make the transition to permanent housing and independent living. This project also meets the goals of the Downtown Infill Incentive District and the Rio Nuevo District.

There is clearly a significant need for affordable rental units in the broader market area. Market Study by Griffin Consulting found that there is an acute need for affordable rental units in the Subject CMA. Based on interviews and on the data subsequently obtained on wait lists and vacancy rates, the projected lease-up to stabilized (96.0 percent, in this case) occupancy time frame for the 50 one-bedroom apartments at 40, 50 and 60 percent of AMI will be 3 months. This equates to an average net absorption rate of 16 units per month.

Description of the Proposal: Include all contemplated actions which logically are either geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32, 40 CFR 1508.25]

The West Point Apartment project will include renovation, redevelopment, demolition and new construction for 50 units of low income housing for persons age 55 and over with a preference for veterans. This Low Income Housing Tax Credit project includes acquisition of the eastern portion of the Westerner Hotel site on the south east corner of the intersection of Stone Avenue and Broadway Blvd. The existing 1 story structure on the east side of the site will be demolished. The exterior of the historic hotel on the west side of the site will not be altered and the new construction on the east side of the site will complement the existing structure. The new 6 story building will have 50 one bedroom/one bathroom units. The new building will feature an interior courtyard and space for social gathering, while providing natural light and fresh air to the residents and the community space below. The community areas will include laundry facilities, a wellness center, classrooms/meeting space, computer lab, and supportive services offices. The project includes a 2,500 sq. ft. roof garden for residents and tenants. The project includes a 2,500 sq. ft. roof garden for residents and tenants with a living green wall, drought tolerant trees and shrubs, and seating areas. Long term bicycle parking will be provided inside the building for residential use.

The 50 one bedroom/one bathroom units will be approximately 540 square feet and are designed using the Arizona Department of Housing (ADOH) prescriptive path to sustainability, which is roughly equivalent to a LEED Gold standard. Specific green building elements to be utilized will include hard surface flooring, smoke-free units and common areas, Energy Star windows and doors, Energy Star appliances and high efficiency/low water usage fixtures.

La Frontera Partners, Inc. the owner and developer, is an Arizona 501 (c)(3) nonprofit community-based organization whose purpose is to promote social welfare, including fostering of low-income housing, to own, develop and operate affordable housing programs, by providing decent housing that is affordable to low-income and moderate-income persons. La Frontera will provide supportive services including computer training, financial literacy, nutrition classes, job training, case management and limited transportation assistance.

Existing Conditions and Trends: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]

The property is located at 10 E. Broadway Blvd. Tucson Pima County AZ 85701, at the south east corner of the intersection of Broadway Blvd. and Stone Avenue, in the pending Downtown Tucson Historic District and adjacent to the Armory Park Historic District. The property is zoned C-3, which will allow the development of over 50 apartments. The neighborhood is a mix of multi-story residential buildings, revitalized historic buildings, office space, commercial development and surface parking areas.

The site measures approximately 0.386 acres or 16,800 square feet and includes the 53,807 sq. ft. historic 1949 former Westerner Hotel building with 4 stories and a fully built-out basement, and an attached 14,896 sq. ft. office space with air rights for 5 additional floors for apartments, and a small surface parking lot. The property is currently vacant. A relocation plan is in development with Tierra Right of Way for 2 tenants that have vacated the building and will be reviewed and approved by HUD.

The western half of the site with the 4 story historic Westerner Hotel will be owned by other entities and will have its interior rehabilitated as a separate project, leaving the historic façade intact. The exterior of the historic hotel on the west side of the site will not be altered and the new construction on the east side of the site will complement the existing structure. SHPO concurred that the rehabilitation and new construction will have no adverse effect on the Westerner Hotel or the proposed Downtown Tucson Historic District.

The site is in a fully developed urban environment in the rapidly expanding downtown core, with access to nearby shopping, museums, parks, restaurants, theaters and other amenities. The downtown area provides public transportation systems and public facilities, including the new street car connecting to the 4th Avenue shopping district and the U of A Main Gate.

Downtown Tucson is currently home to thousands of residents and employees in a mix of neighborhoods. Over the past eight years, Downtown Tucson has experienced an economic revitalization with hundreds of new businesses and housing units, and thousands of new jobs resulting in a thriving Downtown environment. Commercial investments have led to new construction and renovations to a number of historic buildings, creating unique spaces for street-level businesses and office-based firms. New construction, primarily located near the Sun Link modern streetcar line, has re-established Downtown as a magnet for real estate development, and has been a major contributor to Tucson's economy. New projects in development in the immediate vicinity of the site include market rate a condominium/commercial/retail tower, multi-story apartment buildings and office/commercial space.

Funding Information

Grant Number	HUD Program	Funding Amount
M-14-DC-040-229	HOME	\$496,500.00

Estimated Total HUD Funded Amount: \$496,500.00

Estimated Total Project Cost (HUD and non-HUD funds):\$ 15,738,602.00

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation.

Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not within an FAA-designated civilian airport Runway Clear Zone (RCZ) or Runway Protection Zone, or within a military airfield Clear Zone (CZ) or Accident Potential Zone (APZ) Approach Protection Zone. Map in ERR file.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no coastal barrier resources in HUD Region IX. Map in ERR file.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not in a designated flood zone, FEMA Zone X 4019C-2276 L dated 6/16/2011. Flood insurance not required. Map and FIRM in ERR file.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Other than a brief period of construction, the project will have no negative impact on air quality issues or community pollution levels. No EPA/ADEQ Air restrictions for the site. Control of dust during construction is required under the Pima County Fugitive dust map. Permits for activity will not be issued until compliance is certified. Tucson is in conformance with SIP maintenance plan. http://www.regulations.gov/document?D=EPA-R09-OAR-2008-0379-0001
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Arizona has no coastal zones. Map on file.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site and adjacent properties are free of hazardous materials, contamination, toxic chemicals, gasses and radioactive substances which could affect the health or safety of occupants or conflict with the intended use of the subject property. Phase I Environmental Site Assessment (ESA) by Western Technologies on 10/15/15 found 2 possible Recognized Environmental Conditions (RECs) that have been investigated and/or remediated. Report, clean up recommendation and follow up clearance letters in ERR file.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project will have no effect on any federally protected (listed or proposed) Threatened or Endangered Species, nor adversely modify designated critical habitats. The site is fully developed parcel in a downtown urban neighborhood. The NEPAAssist map showed no critical habitat on or near the project site. Map dated 8/18/16 and aerial photos in ERR file.

Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project will expose neither people nor buildings to any above-ground explosive or flammable fuels or chemicals. NEPA Assist map, aerial maps and site visit by HCD staff 2/2/16 show no evidence of above ground storage tanks or hazardous facility within line of site of the project. Documentation in ERR file.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The City of Tucson has no protected farmland including prime or unique farmland, or other farmland of statewide or local importance. Site is in a fully developed urban environment per US Census Maps. Map on File.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project does not involve property acquisition, management, construction or improvements within a floodplain identified by FEMA maps. FEMA Zone X 4019C-2276 L 6/16/2011. Map in the ERR file.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no historic properties adversely affected per 36 CFR 800.4. Reviewed and approved by the City of Tucson Historic Preservation Office and the Plans Review Subcommittee of the Tucson Pima County Historical Commission with concurrence by Arizona State Historic Preservation Office (SHPO). Letters dated 2/8/16 and 2/26/16 in the ERR file.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	DNL Noise study by Western Technologies dated 7/1/16 found a DNL reading of 74 dB, in the normally unacceptable range. A Noise Mitigation report by Spendiarian & Willis Acoustics and Noise Control dated 7/20/16 outlined construction mitigation of at least STC 30, bringing the interior decibel level below the HUD acceptable level of 45 bBA. Concurrence of building specification letter by the project architects Carhuff + Cueva Architects, LLC Dated 7/27/16. Reports and letter in ERR file.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project need not be referred to EPA for evaluation according to the HUD-EPA (Region IX) Sole Source Aquifer Memorandum of Understanding of 1990. Location is currently served by a municipal water and sewer system and will have no impact on the aquifer. Memorandum and map on file.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project does not involve new construction within or adjacent to wet lands, marshes, wet meadows, mud flats or natural ponds. Maps in ERR file.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not located within one mile of a listed Wild and Scenic River. Tucson and Southern Arizona have no wild and scenic rivers. Map on file.

ENVIRONMENTAL JUSTICE		
Environmental Justice	Yes	No
Executive Order 12898	<input type="checkbox"/>	X
The proposed site is suitable for its proposed use and will NOT be adversely impacted by adverse environmental conditions. The project is an urban infill project with adaptive reuse of vacant office space in to low income senior housing, in a currently low income but rapidly improving area. Maps and area census data in ERR file.		

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The property is zoned City of Tucson C-3, which will allow the development of over 50 apartments. This zone provides for mid-rise development of general commercial uses that serve the community and region, located downtown or in other major activity center areas. Residential and other related uses shall also be permitted. Project will maintain historic exterior of the hotel and utilize the existing first floor historic façade for the first floor of the new building. New construction design will complement the historic hotel and existing neighborhood buildings. Site plan was reviewed and approved by Tucson Planning and Development Services Department, Nicole Ewing-Gavin 2/26/16 on file.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	No evidence of erosion, drainage/storm water runoff on site visit by HCD staff 2/2/16. Fully paved and developed lots. Report in ERR file.
Hazards and Nuisances including Site Safety and Noise	2	No visible evidence of onsite hazards or nuisances during site visit by HCD staff 2/2/16. The property is free of those foreseeable hazards and adverse conditions that may affect the health and safety of the occupants, affect the structural soundness of the improvements, and/or impair the customary use and enjoyment of the property. Report on file.
Energy Consumption	2	Minor increase in energy consumption by 50 new units of housing. Tucson Electric Power currently supplies electricity and will continue service. All utilities are currently on site. Buildings will be constructed to Arizona Department of Housing (ADOH) prescriptive path to sustainability, which is roughly equivalent to a LEED Gold standard, with energy efficient and low water usage appliances. HOME application in ERR file.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The target population for the project will be low income persons 55 and older. The site is in downtown core with its expanding job opportunities. Many of the new jobs are entry level or service jobs in the hotel, restaurant and retail businesses. The West Point Apartment project anticipates hiring subcontractors during the construction phase of the project. The project will follow Section 3 in all of employment, construction and subcontracting activities. HOME application and maps in ERR file.
Demographic Character Changes, Displacement	2	Project area is a low income (57 % below poverty level), mixed race (35% minority), mixed use area with approximately 60% of the housing units currently being used as rentals. The target population for the project will be low income seniors at 40, 50 and 60 percent AMI with a preference for veterans. The property is currently. A relocation plan by Tierra Right of Way for 2 previous tenants is in process and will be submitted to HUD for approval. HOME application, census data and maps in ERR file.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The target population for the project will be low income seniors and will not have a significant impact on K-12 education. The project site is within a short commute on public transit of a number of colleges and adult education resources including Pima Community College, University of Arizona and other educational and cultural enrichment opportunities. The site is within walking distance of a number of museums, art galleries, public libraries, theaters, and the Armory Park Senior Center. Maps in ERR file.
Commercial Facilities	2	Site is within 1 mile of grocery stores, pharmacies, retail and service businesses, banks, restaurants, medical providers and thrift stores. The project is directly on Suntran bus east/west # 8 route and the Sunlink streetcar line connecting to the U of A, Banner UMC Medical Center and the 4 th Avenue shopping district. The site is within a short walk of the Ronstadt Transit Center. Maps in ERR file.
Health Care and Social Services	2	The project site is within 4 miles of 2 major medical centers, including the Southern Arizona VA Health Care campus and the El Rio Health Center. Numerous emergency facilities, clinics, physician services and social services are within an easy commute on public transit. La Frontera will provide supportive services including computer training, financial literacy, nutrition classes, job training, case management and transportation assistance. Maps in ERR file.
Solid Waste Disposal / Recycling	2	The City of Tucson Environmental Services Department currently provides onsite waste disposal and recycling services and will continue service. The City of Tucson provides extensive recycling options, including construction debris handling and recycling, landfills, green waste recycling and household hazardous waste disposal services.

Waste Water / Sanitary Sewers	2	Pima County Wastewater provides wastewater and sewer service to site. Letter from Lorenzo Hernandez 2/26/16 on file.
Water Supply	2	City of Tucson water already supplies water to project site. Letter from Timothy Thomure dated 2/26/16 on file.
Public Safety - Police, Fire and Emergency Medical	2	<p>TFD Ken Brouillette reviewed and approved plans submittal 12/8/15. The project is within 1/2 miles of Tucson Downtown Fire Station. Average response time for TFD is 4 minutes.</p> <p>The site is approximately 1/4 mile from the Downtown Police Station. Response time varies depending on the type of call, but the average time for emergency response is 5 minutes or less.</p> <p>The project site is within 4 miles of major medical centers with emergency medical care including Carondelet St. Mary's Hospital, Banner UMC Medical Center, Southern Arizona VA Health Care Center and numerous urgent care facilities. Maps and emails in ERR file.</p>
Parks, Open Space and Recreation	2	The project is with walking distance or a short commute on public transit of the Louse Family YMCA, 3 regional recreation centers including sports fields, swimming pools, fitness programs, recreation classes, senior lunches and other senior programs, basketball courts, tennis courts and open space. There are a number of small parks and open space areas within a reasonable walk of the project site, including Armory Park, Iron Horse Park, El Presidio Park and the Aviation Bikeway. Maps in ERR file.
Transportation and Accessibility	2	The project is directly on Suntran east/west # 8 bus route and the Sunlink streetcar line connecting to the U of A and UMC and the 4 th Avenue shopping district. The site is within a short walk of the Ronstadt Transit Center. The site is fully accessible by car and has adequate street access and off street parking in nearby public parking garages. La Frontera will provide limited transportation assistance. Long term bicycle parking will be provided inside the building for commercial and residential use. The residents have access to the City of Tucson Sun Shuttle and other medical transportation providers. Maps and photos in ERR file.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The site has no unique natural features or water resources. The site is fully developed and has been graded, leveled and completely built up or paved. Site visit by HCD staff 2/2/16. Photos and maps in ERR file.
Vegetation, Wildlife	2	The site is fully developed and has been graded, leveled and completely built up or paved. Site visit by HCD staff 2/2/16. Photos and maps in ERR file.
Other Factors		

Additional Studies Performed:

Phase I Environmental Site Assessment by Western Technologies 10/15/15

Market Analysis by Griffin Consulting November 2015

HUD Noise Assessment by Western Technologies dated 7/1/16

HUD Noise Abatement Plan by Spendiarian & Willis Acoustics and Noise Control dated 7/20/16.

Field Inspection (Date and completed by):

2/2/16 by Glenn Fournie, HCD staff.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Arizona Department of Housing (ADOH)

City of Tucson Housing and Community Development Department

City of Tucson Planning and Development Services

City of Tucson Department of Transportation

City of Tucson Suntran

Tucson Fire Department

Tucson Police Department

City of Tucson Department of Environmental Quality

Tucson Water

Pima County Wastewater Management

City of Tucson Historic Preservation Officer Dr. Jonathan Mabry

SHPO Robert Frankenburger

La Frontera Partners, Inc.

Greiner Engineering Inc.

Carhuff-Cueva Architects LLC

Ryden Architects Inc.

Cumulative Impact Analysis [24 CFR 58.32]:

The primary objective for this project is to invest in Downtown Tucson, while providing a suitable living environment and supporting low income households working in and/or benefitting from living in downtown Tucson. This project provides affordable housing, adaptive reuse of vacant buildings while also expanding services access and better utilizing the existing residential designations in this area. The housing project is aligned with the goals of the City of Tucson General plan, including Infill Incentive District plans for the downtown area and the Rio Nuevo District. The proposed improvements provide positive secondary benefits of stabilizing area tax bases and improving overall property values.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Several alternatives were considered for this project; however, the downtown location of this site is uniquely central and accessible to individuals who would benefit most from this affordable housing development, those without transportation and those who work in downtown areas. Additional locational considerations included the target amenities as defined by the Arizona Department of Housing. One of the primary factors that necessitate this development is the dire need for affordable rental housing near downtown Tucson, which is also located on or near existing bus/transportation lines and within walking distance to shopping and important services.

This is a project of opportunity with the potential to address the need for development in the downtown area with a private development partner who has resources to leverage federal and private funding. Alternative sites that exist do not provide the cost effective or "ready to develop" assets of the subject property. Location of another site with the combination of access to transportation services and public amenities, zoning compatibility would not be readily found.

Reducing the number of units or density of the project would move it out of the range of economic feasibility for the developer. There is an economy of scale that if the funding is too limited, it is too costly to implement the activity. Other resources which might be available are not readily apparent and developing additional funding resources for this project would only create a substantial delay or eliminate the project completely.

No Action Alternative [24 CFR 58.40(e)]:

The no action alternative is not feasible for this project. The dire need for low income housing in this area, based on the jurisdictional demographic needs has been researched and established in the City of Tucson Consolidated Plan. If the project were abandoned, the need to redevelop the downtown area would not be served and the need to address the affordable housing demand which is increasing in the City of Tucson.

Summary of Findings and Conclusions:

The proposed West Point Apartment project will not adversely affect environment or the neighborhood. The activity is compatible with the existing uses in the area. There will be little to no impact on existing resources or services in the area. This project has been developed with the overall goal of securing resources to provide affordable housing assistance in the downtown area that creates a suitable living environment and can expand available resources.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

DNL Noise study by Western Technologies dated 7/1/16 found a DNL reading of 74 dB, in the normally unacceptable range. A Noise Mitigation report by Spendiarian & Willis Acoustics and Noise Control dated 7/20/16 outlined construction mitigation of at least STC 30, bringing the interior decibel level below the HUD acceptable level of 45 bBA. Concurrence of building specification letter by the project architects Carhuff + Cueva Architects, LLC Dated 7/27/16. The noise mitigation requirements will become part of the HOME & construction contracts and included in the City of Tucson Planning and Development Services Department building inspection & permitting process.

No other mitigation required.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: _____

Date: 9/14/16

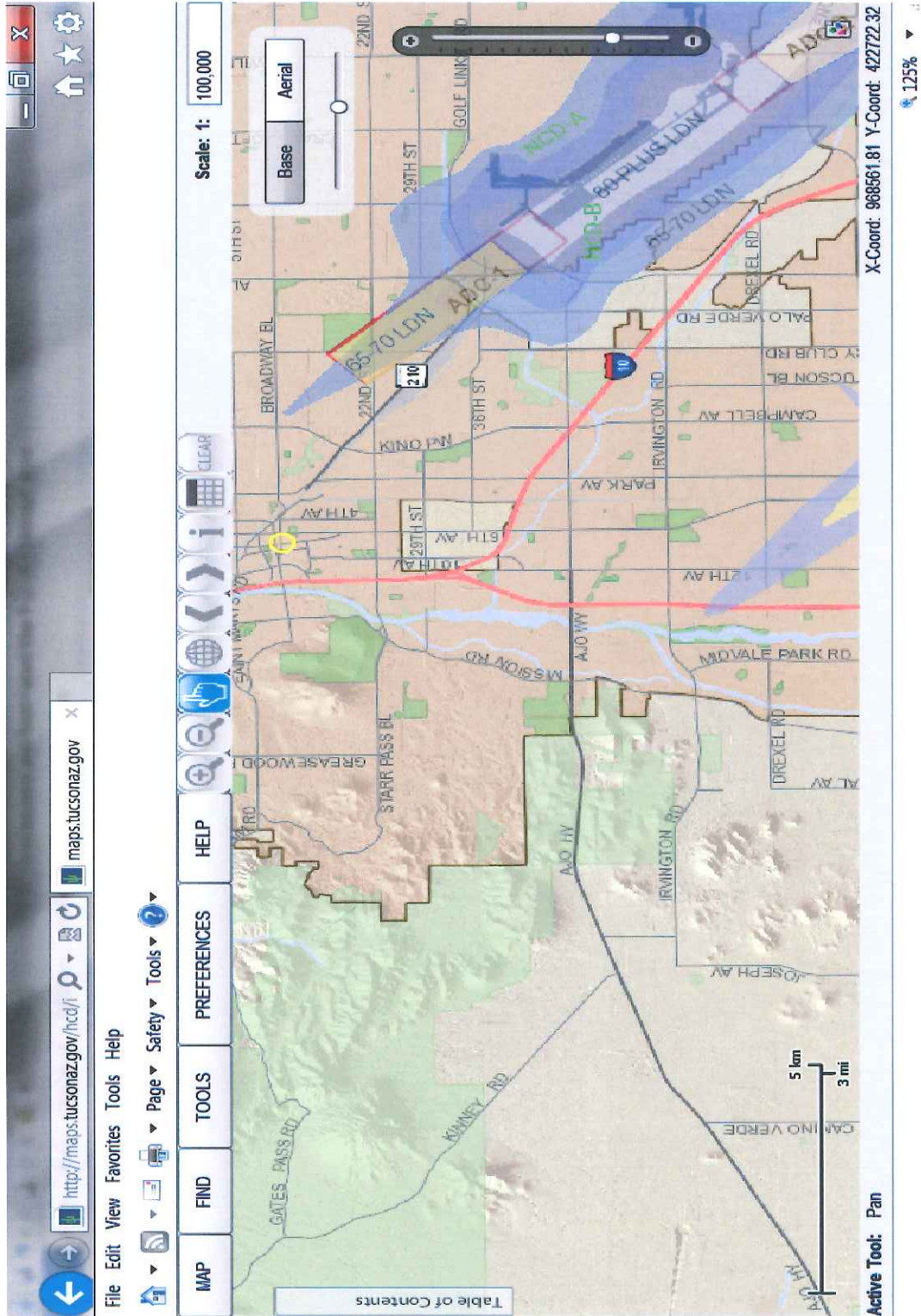
Glenn Fournie, Project Coordinator City of Tucson Housing and Community Development Department

Certifying Officer Signature: _____

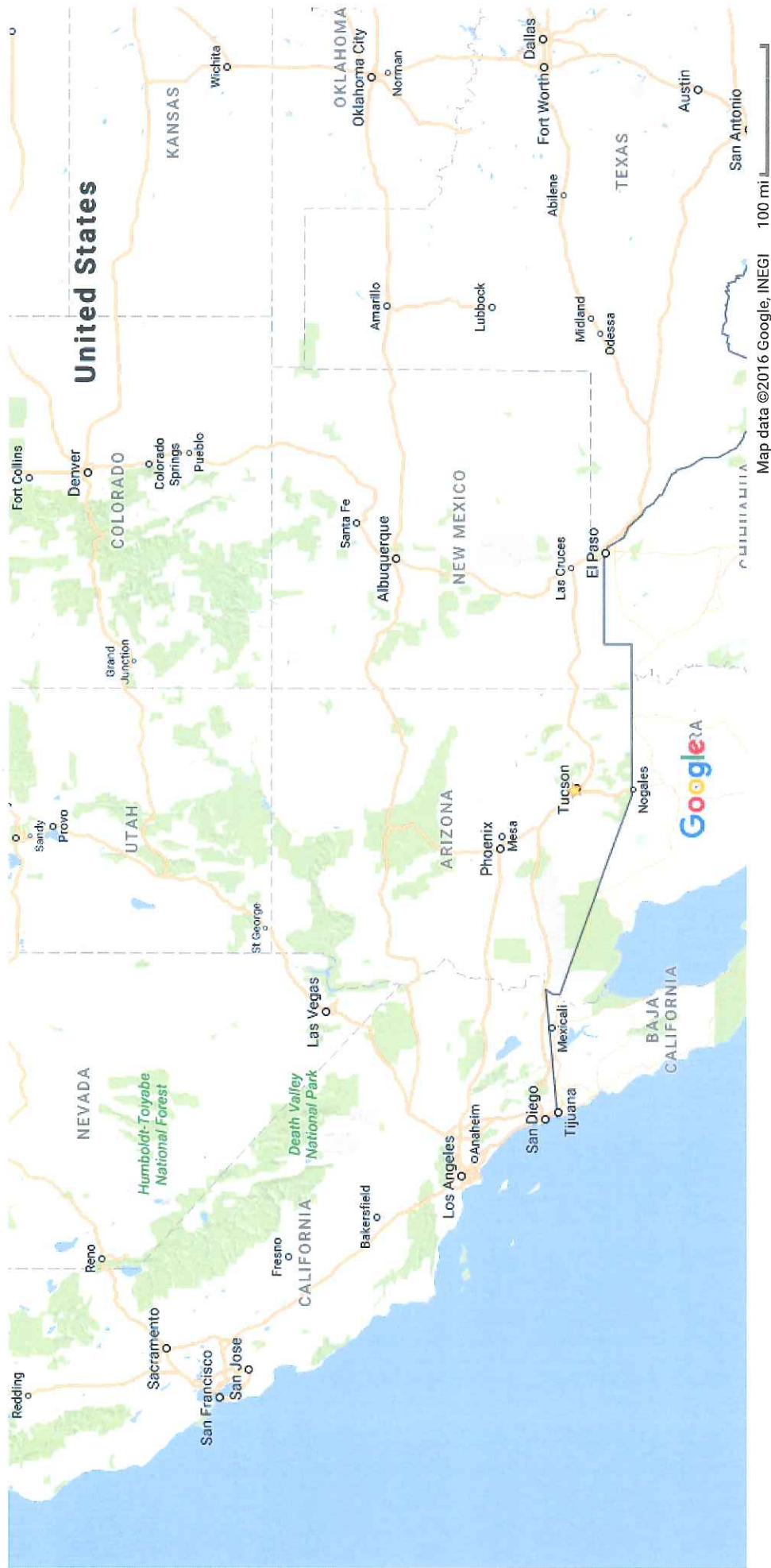
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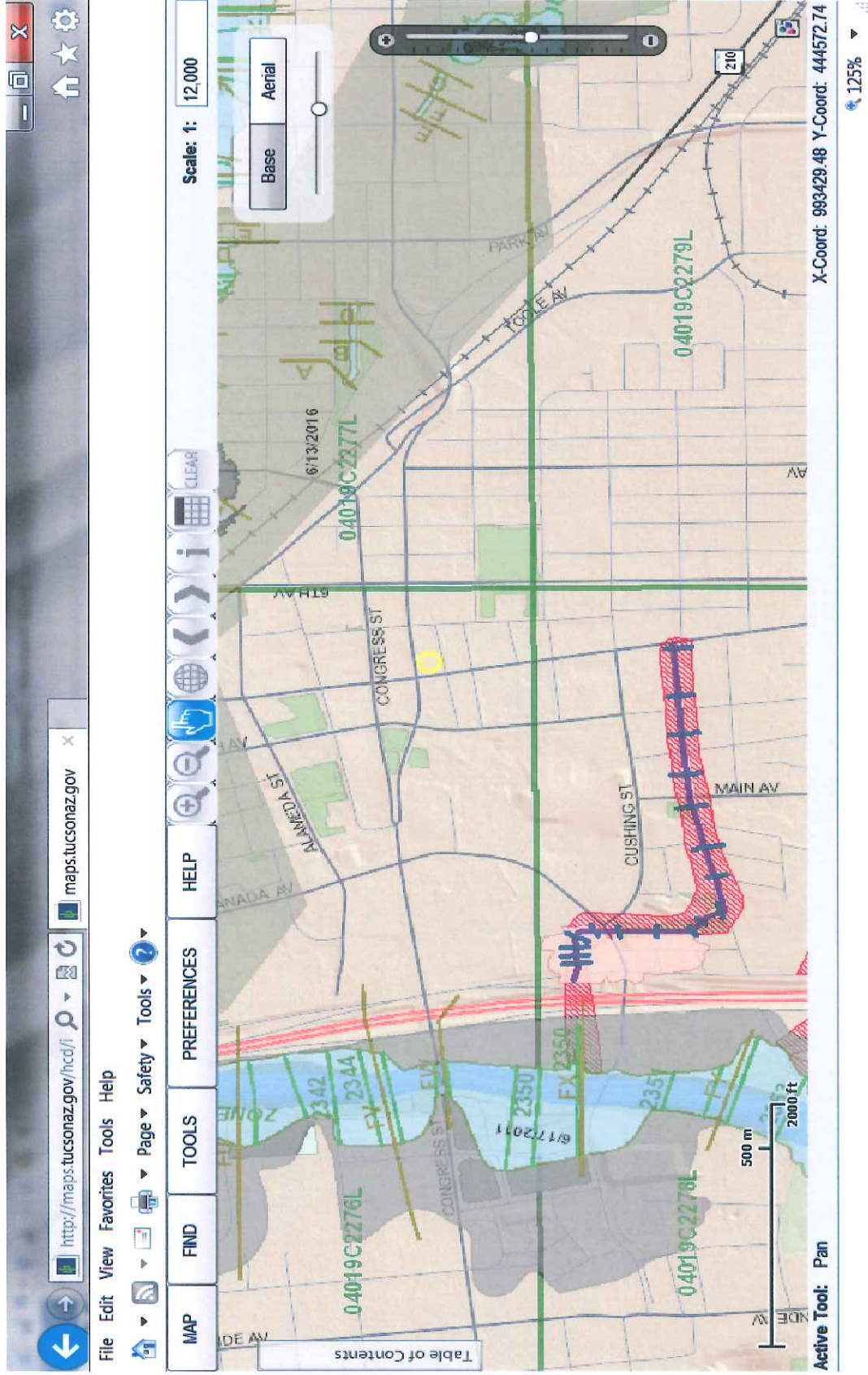
Sally Stang, Director City of Tucson Housing and Community Development Department

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



Airport Hazard 8-22-16
West Point Apartments 10 E. Broadway Blvd. Tucson 85701





Flood Insurance and Flood Hazard 8-22-16 FEMA Zone X 4019C-2276 L 6/11
West Point Apartments 10 E. Broadway Blvd. Tucson 85701



September 7, 2016

La Frontera Partners, Inc.
504 West 29th Street
Tucson, Arizona 85713

Attn: Mr. Jason Hisey

Re: Oil Sample Collection and Laboratory Analysis West Point Apartments at 10 East Broadway Boulevard in Tucson, Arizona. WT Job No. 2986JC096.

Western Technologies Inc. (WT) is pleased to provide you with this letter report concerning PCB oil sample collection specific to the above referenced property (the Property). WT was authorized by La Frontera Partners, Inc. according to WTs Authorization for Services dated September 1, 2016.

On October 1, 2015 a Phase I was conducted at the Property (WT Job Number 2985JC106). The ESA revealed the leaking transformer fluid in the basement to be a REC and recommended the fluid be assessed for the presence of PCBs.

On September 2, 2016, Mr. Jason Criss and Ms. Vanessa Lentini with WT visited the Property to collect the spilled fluid in the basement mechanical room. Upon arrival, WT noted the fluid to be gone and the foundation was dry with de minimis staining (see attached images). WT was unable to collect a sample of the suspect spilt fluid and therefore did not submit any samples for laboratory analysis.

WT has no further recommendations for the leaking transformers in the basement and no longer considers this a REC to the Property.

Western Technologies Inc. is pleased to provide you with these services. Should you have any questions or concerns please contact me at (520) 748-2262.

Sincerely;

WESTERN TECHNOLOGIES INC.
Environmental Services



Stephen G. Collins, REPA
Director of Environmental Services

La Frontera Partners, Inc.
10 East Broadway Boulevard
Tucson, Arizona
Picture Log

WESTERN TECHNOLOGIES INC.

WT Job No.: 2986JC096

Date: September 2, 2016



Picture 1 – Wall mounted transformers and unknown fluid leaking on the concrete slab, October 1, 2015.



Picture 2 – No visible fluid on the concrete September 2, 2016.

PARTIAL

PHASE I ENVIRONMENTAL SITE ASSESSMENT

COMMERCIAL PROPERTY

10 East Broadway Boulevard
Tucson, Arizona
WT Job No. 2985JC106

PREPARED FOR:

Cope Properties, LLC
82 South Stone Avenue
Tucson, Arizona 85701
Attn: Mr. Philip A. Carhuff

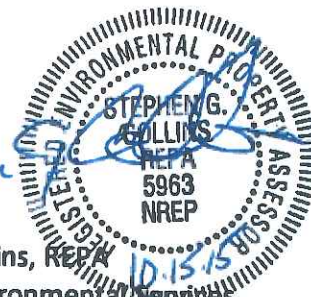
October 15, 2015



Jason W. Criss, E.I.T
Staff Engineer



Reviewed By: Stephen G. Collins, REPA
Director of Environmental Services





**Western
Technologies Inc.**
The Quality People
Since 1955

3480 South Dodge Boulevard
Tucson, Arizona 85713-5435
(520) 748-2262 • fax 748-0435

October 15, 2015

Cope Properties, LLC
82 South Stone Avenue
Tucson, Arizona 85701

Attn: Mr. Philip A. Carhuff

Re: Phase I Environmental Site Assessment
Commercial Property
10 East Broadway Boulevard
Tucson, Arizona

WT Job No. 2985JC106

Western Technologies Inc. presents this Phase I Environmental Site Assessment of the commercial property at 10 East Broadway Boulevard in Tucson, Arizona. The results of our assessment, significant findings and conclusions are presented in the enclosed report.

This report completes the agreed scope of services. If you have any questions or if we may be of further assistance to you, please do not hesitate to contact us. Thank you for allowing us to provide these services.

Sincerely,
WESTERN TECHNOLOGIES INC.



Stephen G. Collins, REPA
Director of Environmental Services

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EXECUTIVE SUMMARY

Western Technologies Inc. (WT) completed a Phase I Environmental Site Assessment (ESA) of the commercial property at 10 East Broadway Boulevard in Tucson, Arizona. The purpose of this ESA was to identify to the extent feasible, pursuant to the processes described herein, recognized environmental conditions (RECs), in connection with the Property.

The Property was approximately 16,800 square-feet in size and developed with an approximate 40,791 square-foot, multi-story structure; four stories above-ground and one story below-ground. The structure consisted of stucco covered masonry walls, concrete floors, with interior perimeter stairwells and three elevators that provided access to each floor. The elevators were not-operational during the on-site reconnaissance. Men's and women's restrooms, custodial rooms, pipe chases, and communication rooms were on the south side of the structure, on each floor.

The lower level of the structure consisted of conference rooms, varying in shape and size, with offices suites and lockable storage units. The structures heating and cooling units were in the southwest corner, and consisted of boilers, chillers and associated colored coded piping. Piping from the units ran to each of the floors through the aforementioned pipe chases as part of the structures closed looped system. The 1st floor consisted of several office suites, varying sizes and capacity, and decorative red brick planters. Two of the 1st floor suites were occupied by tenants during the on-site reconnaissance. The 2nd through 4th floors were vacant and unoccupied during the site reconnaissance. Each of the floors consisted of individual offices and/or office suites, reception and waiting areas.

The area of the Property was within a residential and commercial area of downtown Tucson, Arizona. The primary arterial roadways were East Broadway Boulevard adjoining to the north, Jackson Street adjoining to the south, and North Stone Avenue adjoining to the west.

The sites adjoining the Property consisted of the following: north was east Broadway Boulevard, followed by multi-story residential and commercial developments; south was Jackson Street, followed by the Historic Old Pueblo Club Building; east was an asphalt paved parking lot, followed by multi-story residential housing; and west was North Stone Avenue, followed by commercial development and associated asphalt paved street and parking lots.

Based on our observations during the reconnaissance, we did not identify evidence of potential RECs on the Property resulting from activities on the adjoining sites

In the 1953 aerial photograph, the Property was developed with a multi-story structure. By the 1967 aerial photograph, an elevated pool and associated sundeck was erected on the northeast corner of the 1st floor roof. A pathway appeared to provide access for guests from the 2nd floor to the pool and sundeck. The pool and pathway were razed by the 1979 aerial photograph, and the 2nd floor addition was constructed. Subsequent aerial photographs reviewed depicted no changes to the structure, with the exception of areas of roof repair and roof mounted air handler replacement. The Property appeared similar to that observed during the site reconnaissance.

The database findings did not identify the Property in the searched Federal USEPA databases. In the surrounding area, five sites were identified in the Comprehensive Environmental Response Compensation Liability Information System (CERCLIS) including No Further Remedial Action Planned (NFRAP) listings. The EPA concluded that "no further activity" was planned for the sites and the investigations were closed. Based on the closure status, these sites were not considered REC's to the Property.

One site was identified on the CERCLIS listing, Oliver's Cleaners, 0.43 miles northeast of the Property. The EPA conducted assessments on the site and according to the EPA, this site was under current remediation. Based on the current remediation activities and distance to the Property, this site was not considered a REC to the Property.

La Placita Village listed at 110 South Church Avenue, Suite 8300, 0.12 miles west of the Property was identified in the RCRA Conditionally Exempt Small Quantity Generator database, with no violations of enforcement actions taken. Based on the distance to the Property and no violations or enforcement actions taken, this site was not considered a REC for the Property.

A total of 13 federal brownfields sites were identified within a ¼-mile of the Property. Various site investigations were conducted, including Phase I and II Environmental Site Assessments, with three sites requiring no remediation. Remediation or further investigations were recommended for the remaining 10 sites. Based on the distance to the Property, these sites were not considered RECs to the Property.

The database findings did not identify the Property in the searched ADEQ databases. In the surrounding area, two sites were identified in the Arizona Superfund Program List. The two identified sites are the 7th Street and Arizona Avenue and Park-Euclid. According to information obtained from the ADEQ website, both sites are currently under active remediation. Based on the current remediation activities and distance to the Property, these two sites are not considered RECs to the Property.

A total of three sites with five registered USTs were identified within the ¼-mile minimum search distance, with all five reported as removed from the ground. Based on the removed status, the USTs were not considered RECs to the Property.

A total of 19 sites with 32 reported LUST cases were identified within a ½-mile search distance of the Property, with 24 reported as closed by ADEQ. The 8 remaining sites were characterized and remediation was recommended. Based on the ADEQ closed status and distance to the Property, these LUST sites were not considered RECs to the Property.

WT searched the ADEQ on line database of land use restrictions, the VEMUR/DEUR Database, and found no records of listed land use restrictions applicable to the Property.

This section presents our opinion regarding the probable impact to the Property from known or suspect RECs which may include current RECs, historical RECs, controlled RECs, or de minimis conditions that were identifiable from the records reviews, interviews, and site reconnaissance.

- **Leaking Transformers** – A panel of four, wall-mounted transformers on the east wall in the mechanical room provided electricity to structure. At the time of the reconnaissance, the transformers were damaged and leaking an unknown fluid onto the concrete floor. Based on the damaged and leaking condition of the transformers, WT considered this a REC to the Property.
- **Elevator Equipment** - The commercial structure contained three cable guided elevators, each with operating equipment that consisted of a drive shaft, hydraulic oil reservoir, pumps and counter weight systems. WT observed some oily staining and ponding liquid on the concrete around the base of the elevator. Based on our observations, we believe the staining was de minimis in nature and did not represent a REC.
- **Emergency Generator** - A flammable storage cabinet and various 5-gallon containers of paint, and roofing materials, along with 5-gallon metal containers of fluids and lubricants were stockpiled on the roof, west of the emergency generator. Based on the current condition and storage of diesel fuel, fluids and lubricants containers, WT considered this as a potential REC to the Property.

This assessment has revealed no evidence of RECs currently in connection with the Property, except for the following:

- **Leaking Transformers** - WT recommends the leaking transformer fluid be assessed for the presence of PCBs and managed accordingly.
- **Emergency Generator** – WT recommends the diesel fuel and all other containers be properly removed.

If additional information becomes available or known that may suggest the presence of recognized environmental conditions currently in connection with the Property, contact this firm for potential recommendations.

1.0 INTRODUCTION

This report presents the results of a Phase I Environmental Site Assessment (ESA) of the commercial property at 10 East Broadway Boulevard in Tucson, Arizona ("the Property"). According to Pima County assessor records, the parcel number for the Property was 117-13-0390. The cadastral description of the Property relative to the U.S. Public Land Survey System was generally within a portion of the northeast quarter, of the northeast quarter of the northeast quarter of Section 13, Township 14 South, Range 13 East, Gila and Salt River Baseline and Meridian, Pima County, Arizona. Figure 1 in Appendix A shows the location of the Property.

1.1 Project Authorization

Western Technologies Inc. (WT) was authorized by Cope Properties, LLC to perform this ESA according to WT Contract No. 2985PC090, dated September 23, 2015.

1.2 User Reliance

WT prepared this ESA for Cope Properties, LLC. This ESA may not be utilized or relied upon by any other person or entity without the express written consent of WT and the completion of the User's responsibilities as described in ASTM E 1527-13 and the All Appropriate Inquiries Rule (AAI Rule).

1.3 Environmental Professionals Statement

I, Stephen G. Collins, declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR § 312.10. I have the specific qualifications, based on education, training, and experience, to assess a property of the nature, history, and setting of the Property. I have developed and performed the all appropriate inquiries in general conformance with the standards and practices set forth in 40 CFR Part 312.

Jason W. Criss also with WT, participated in the preparation of this ESA under the direction of Mr. Collins. Mr. Criss conducted the site reconnaissance, interviews, and records reviews under the supervision and responsible charge of Mr. Collins. The final review of the written report and the formulation of opinions regarding Recognized Environmental Conditions were performed by Mr. Collins. Resumes for these individuals are available from this office upon request.

1.4 Purpose

The purpose of this ESA was to identify, to the extent feasible pursuant to the processes described herein, recognized environmental conditions (RECs) in connection with the Property. According to the ASTM E 1527-13, RECs are "the presence or likely presence of any hazardous substances or petroleum products on, in, or at the Property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De

minimis conditions are not RECs." WT used its judgment to identify migration pathways and RECs.

1.5 Scope of Services

The scope of services generally followed the applicable provisions of the Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-13) and the scope and limitations in our contract for this project, and consisted of a reconnaissance of the Property, interviews, a review of physical setting information, reviews of historical use research, reviews of standard Federal and State databases and local records, file reviews (if deemed necessary by the environmental professional), and preparation of this report.

2.0 PROPERTY AND AREA INFORMATION

The reconnaissance of the Property was performed by Mr. Stephen G. Collins, Mr. Jason W. Criss and Ms. Vanessa L. Lentini on October 1, 2015. Ms. Susan Ong who was the Property Manager and has worked at the Property for approximately 20 years accompanied WT. Messrs. Collins and Criss, and Ms. Lentini, walked the perimeter and interior areas of the Property and made observations about its condition. WT was unable to gain access to several offices, office suites, storage rooms, and conference rooms within the interior of the structure. Pictures taken during the reconnaissance of the Property are included in Appendix B. Figure 2 in Appendix A depicts general features observed on the Property.

2.1 Current Property Use and Occupancy

The Property was developed with a multi-story commercial structure with two tenants on the 1st floor. The remainder of the structure was vacant and unoccupied at the time of the reconnaissance.

2.2 Property Improvements and Features

The Property was approximately 16,800 square-feet in size and developed with an approximate 40,791 square-foot, multi-story structure; four stories above-ground and one story below-ground. The structure consisted of stucco covered masonry walls, concrete floors, with interior perimeter stairwells and three elevators that provided access to each floor. The elevators were not-operational during the on-site reconnaissance. Men's and women's restrooms, custodial rooms, pipe chases, and communication rooms were on the south side of the structure, on each floor.

The lower level of the structure consisted of conference rooms, varying in shape and size, with offices suites and lockable storage units. The structures heating and cooling units were in the southwest corner, and consisted of boilers, chillers and associated colored coded piping. Piping from the units ran to each of the floors through the aforementioned pipe

chases as part of the structures closed looped system. The 1st floor consisted of several office suites, varying sizes and capacity, and decorative red brick planters. Two of the 1st floor suites were occupied by tenants during the on-site reconnaissance. The 2nd through 4th floors were vacant and unoccupied during the site reconnaissance. Each of the floors consisted of individual offices and/or office suites, reception and waiting areas.

2.3 Utilities

Water and sewer services were provided to the Property by City of Tucson and Pima County Waste Water, respectively. Electricity was provided by Tucson Electric Power. Natural gas was provided by Southwest Gas.

2.4 Current Adjoining Property Use and Description

The area of the Property was within a residential and commercial area of downtown Tucson, Arizona. The primary arterial roadways were East Broadway Boulevard adjoining to the north, Jackson Street adjoining to the south, and North Stone Avenue adjoining to the west. The sites adjoining the Property consisted of the following:

- North was east Broadway Boulevard, followed by multi-story residential and commercial developments addressed at 1 East Broadway Boulevard;
- South was Jackson Street, followed by the Historic Old Pueblo Club Building addressed at 101 South Stone Avenue;
- East was an asphalt paved parking lot, followed by multi-story residential housing addressed at 44 East Broadway Boulevard, and;
- West was North Stone Avenue, followed by commercial developments and associated asphalt paved street and parking lots.

Based on our observations during the reconnaissance, we did not identify evidence of potential RECs on the Property resulting from activities on the adjoining sites

2.5 Physical Setting Sources

Topographic maps from the USGS and hydro-geologic reports from the Arizona Department of Water Resources (ADWR) were reviewed as standard physical setting sources of information about the Property and surrounding areas. The physical setting information represents a general indication of topographic and hydro-geologic conditions that may reflect pathways for the migration of hazardous substances and petroleum products onto or away from the Property. However, this regionally-based information may not accurately describe current site-specific physical setting conditions.

According to the USGS *Tucson, Arizona* Quadrangle (7.5 Minute Series, 2015), the Property had an approximate elevation of 2,385 to 2,390 feet above Mean Sea Level and the terrain sloped to the southeast.

Based on information from the latest available report, *Hydrological Map Series Report Number 11*, entitled *Maps Showing Groundwater Conditions in the Upper Santa Cruz Basin Area, Pima, Santa Cruz, Pinal and Cochise Counties, Arizona-1982*, published by the ADWR, the Property and adjoining area were within the Tucson sub-area of the Upper Santa Cruz Basin in the Tucson Active Management Area. The area was within the Basin and Range Physiographic Province and was characterized by broad alluvial-filled sub-basins, bounded by steep, rugged, fault-block mountains. The Santa Cruz River and its tributaries provided the major surface water drainage for the Tucson sub-area. Because of the ephemeral nature of the river and other streams in the Upper Santa Cruz Basin area, groundwater was the only dependable source of water and was mined for a variety of uses. Colorado River water, via the Central Arizona Project (CAP) canal, was being blended with groundwater and delivered to certain areas in Tucson and Pima County. Within the Tucson sub-area, the principal water-bearing units were, in ascending order, the Pantano Formation, the Tinaja Beds, and the Fort Lowell Formation. The Fort Lowell Formation provided most of the groundwater that was withdrawn from the sub-area. The overall regional direction of groundwater movement in the Tucson sub-area was towards the north, following the Santa Cruz River drainage.

The Arizona Department of Water Resources (ADWR) indicates that the depth to groundwater in the vicinity of the Property was approximately 80 to 125 feet below the ground surface. The direction of groundwater flow beneath the Property appeared to be toward the southwest. However, nearby groundwater pumping, groundwater recharge, and nearby mountain blocks, may locally alter the natural groundwater flow direction.

3.0 RECONNAISSANCE FOR KNOWN AND SUSPECT RECS

This section provides information about potential sources of known and suspect RECs in connection with the Property.

3.1 Potential PCB Sources

Electrical transformers, capacitors, and possibly hydraulic equipment including elevators, are potential sources of PCBs.

Tucson Electric Power (TEP) owns two pole-mounted transformers south of the Property. The transformers were in good condition with no indications of spills or leaks from the units. The PCB-content of the transformers is unknown, however, based on our understanding, the owner of the transformers would be responsible for the remediation of soils or other materials impacted by the released oils.

A panel of four, wall-mounted transformers on the east wall in the mechanical room provided electricity to structure. At the time of the reconnaissance, the transformers were damaged and leaking an unknown fluid onto the concrete floor. The leaking fluid had stained portions of the concrete, and pooled fluid remained in low-lying areas. Based on the damaged and leaking condition of the transformers, WT considers this a REC to the Property.

The commercial structure contained three cable guided elevators, each with operating equipment that consisted of a drive shaft, hydraulic oil reservoir, pumps and counter weight systems. The elevators were taken out of service by the City of Tucson in June 2011. WT observed maintenance and service records for the elevator that dated back to the late 1960's. We observed some oily staining and ponding liquid on the concrete around the base of the elevator. Based on our observations, we believe the staining was de minimis in nature and does not represent a REC.

3.2 Aboveground Storage Tanks (ASTs)

ASTs consist of portable fuel tanks on construction sites, portable fertilizer tanks in agricultural fields, process tanks in industrial applications, large bulk storage tanks at distribution facilities, storage tanks for the dispensing of fuel and lubricants and for the collection of liquid waste materials, and as integral fuel tanks to back-up power generators.

A back-up diesel power generator was on the roof of the structure. WT estimated that the fuel tank could hold approximately 10-15 gallons of diesel fuel, but was unable to determine to exact amount. WT did not observe staining or leaking from the generator, therefore the generator was not a REC to the Property.

3.3 Underground Storage Tanks (USTs)

Surface indications of existing or former USTs includes pump islands, fill ports, vent pipes, vapor monitoring wells, inventory monitoring equipment, asphalt patches over former tank pits or fuel lines, and remedial systems.

None of the listed surface indications of existing or former USTs was noted during the reconnaissance.

3.4 Hazardous Substances, Petroleum Products, and Containers

During our reconnaissance, a former conference room converted to storage and individual storage rooms at the north end of the lower level. The rooms contained office materials, construction materials and debris, cleaning chemicals and products, oils, paints in retail-sized containers from 1-quart to 5-gallon in size. These materials appeared to be stored and used in an appropriate manner, however WT did observe indications of spills and staining associated with paints and construction materials. Based on our observations, we believe the staining was de minimis in nature and does not represent a REC.

A flammable storage cabinet, on the east side of the 2nd floor, contained (2), three-gallon portable, plastic containers full of diesel fuel. The storage cabinet also contained fluids and cleaning chemicals associated with the maintenance and upkeep with the emergency generator. Various 5-gallon buckets of paint, and roofing materials, along with 5-gallon metal containers of fluids and lubricants were stockpiled on the roof, west of the emergency generator. The various buckets and containers exhibited signs of fatigue, cracks, and rust. Based on the current condition and storage of diesel fuel, fluids and lubricants containers, WT considered this a potential REC to the Property.

3.5 Solid Waste Indicators

Indications of solid waste storage or disposal include dumpsters, roll-off containers, waste piles, uncontrolled disposal of trash, demolition debris, construction debris, or vegetation, wildcat dumping, tires, litter, unusual mounding or depressions, fill or suspected fill from unknown sources, and debris commingled in disturbed surface areas.

A 55-gallon rolling, plastic tote appeared to contain general office debris and waste from the associated tenants. Staining, leakage or chemical odors indicative of the disposal of hazardous substances or petroleum products was not seen.

3.6 Wastewater, Stormwater, and Other Liquid Discharges

Wastewater discharges include existing or former surface impoundments, oil/water separators, sumps, catch basins, injection wells, drywells receiving non-storm water related discharges, wastewater treatment systems, septic systems including tanks, leach fields, and seepage pits, exterior pipe discharges, pits, ponds, and lagoons.

Drains were observed throughout the building and reportedly discharged to the sanitary sewer system. Within the mechanical room, two subsurface sumps appeared to be constructed of concrete and equipped with a sump pump that was piped to the exterior of the building. It appeared the sumps/pumps were designed to contain and remove residual fluids should they accumulate in the basement area.

Natural or engineered storm water or drainage control features were not seen on the Property.

Indications of spills or releases of liquid phase materials consist of odors, pools of liquid, stains, corrosion or discoloration on floors, pavement or the ground surface, sheens on water, and stressed vegetation.

No surface indications of the listed liquid waste indicators were observed on the Property during the reconnaissance.

3.7 Air Emission Control Equipment

Air emission control equipment can include laboratory hoods, exterior vent stacks, incinerators, chimneys, bag houses, cyclones, and paint booths and result in the generation of used products or materials consisting of hazardous substances or petroleum products.

No indications of air emission control equipment were noted on the Property during the reconnaissance.

WT observed roof exhaust hoods on the 1st floor roof from previous restaurant occupants at the Property. According the Property Manager, the exhaust hoods are no longer in use and have not been in several years.

3.8 Existing or Former Wells

Wells can be identified through the presence of well casings extending above the ground surface, turbines or pumps, a water storage tank, pressure tank, or water distribution piping, or traffic-rated covers over monitoring wells. Water produced from wells can be utilized for irrigation, public distribution, personal consumption, or environmental or hydrological monitoring or remediation.

No indications of groundwater wells were observed on the Property during the reconnaissance.

4.0 INTERVIEWS

This section summarizes information from interviews conducted as part of this ESA. Questionnaires completed by interviewees and other correspondence are presented in Appendix C.

4.1 Interviews with the User of this Report

Cope Properties, LLC has been identified as the "User" of this ESA and WT made multiple attempts to contact them regarding the completion of WT's User Questionnaire. At the issuance of this report, the User has not responded to our request. We will issue an addendum with the information if we receive a response.

4.2 Interviews with the Property Owner, Current Operators, or Occupants

Ms. Susan Ong, Property Manager with Broadstone Commercial Real Estate, Inc. and owner of the Property, completed WT's Owner/Key Site Manager Questionnaire on October 14, 2015. She has been familiar with the Property for 18 years. She indicated that the City of Tucson provided water, Pima County provided solid waste, Tucson Electric Power provided electricity and Southwest Gas provided natural gas. Ms. Ong indicated that an above-ground storage tank and hazardous substances, both referring to the emergency generator, were on the Property. Ms. Ong was unaware of stormwater and drainage provisions or

environmental investigations or actions at the Property. She also indicated that no previous environmental reports regarding the Property were available for review.

4.3 Interviews with Past Owners, Operators, or Occupants

WT did not interview past owners, operators, or occupants of the Property because the current representatives of the Property and readily available information adequately answered questions related to the nature of current and historic uses of the Property. Therefore, this data gap should not prevent WT from rendering an opinion regarding RECs on the Property.

4.4 Interviews with Others

WT routinely contacts state and local government agencies about information and records concerning the Property. These contacts/interviews may be made in person, by telephone or in writing. We made reasonable attempts to interview at least one representative of the following types of state or local government agencies: local fire department; local health agency; hazardous waste control agencies; building permit agencies; or groundwater use permitting agencies.

If WT identifies government officials with specific information about the Property, these interviews are also summarized in this section of the report. We did not identify government officials with direct knowledge of the Property.

5.0 HISTORICAL RECORDS INFORMATION

The objective of consulting historical sources was to develop a history of obvious uses of the Property back to 1940, or to the first developed use of the Property, whichever is earlier, unless a data failure occurred. The intervals between standard historical sources reviewed for this exceeded 5 years, and the earliest standard historical source reviewed for this ESA was a Sanborn Fire Insurance Map dated 1901.

5.1 Property Tax Files

According to records obtained from the Pima County Assessor's Office, the current owner of Assessor's Parcel Number 117-13-0390 was Melinda Elizabeth Curry ½ et al.

A copy of the tax file records are provided in Appendix D.

5.2 Land Title Records

A chain-of-title report was not commissioned as part of this ESA. This data gap should not prevent WT from rendering an opinion regarding RECs.

5.3 Zoning/Land Use Records

The Pima County Map Guide web site was reviewed for information about zoning and land use classifications for the Property and surrounding area. The Property was within a City of Tucson zoning designation of OCR-2, which allows for high-rise mixed office, commercial, and residential uses located in major activities centers.

5.4 Local Street Directories

Local street directories are annual publications that list the names of telephone service recipients by address. The information contained in local street directories may be useful in determining the type of facility or business that operated at a particular address in a given year. A total of 30 selected annual volumes with publication dates ranging from 1940 through 2014 were reviewed for listings at 10 East Broadway Boulevard, 63 and 103 South Stone Avenue. There were no listings for 63 South Stone Avenue.

	YEARS	LISTING
10 East Broadway Boulevard (Property)	2002 – Current	Building (Multitenant Listing, including City, State Federal Agencies, Attorney's, Real Estate)
	1986 – 2002	The Westerner Building (See Building Directory)
	1940 – 1985	No Listings
	1984 – Current	No Listings
103 South Stone Avenue (Property)	1979	Medco Investments Discount Package Liquor Westerner Lounge Cocktail
	1974	Posada Westerner Hotel Posada Westerner Hotel Coffee Shop Restaurant Posada Westerner Hotel Stallion Room Cocktail
	1969	American Finance Corporation Westerner Hotel Westerner Hotel Coffee Shop Restaurant
	1964	American Finance Corporation First Thrift of Arizona Saving and Loans Westerner Hotel

		Westerner Hotel Coffee Shop Restaurant
	1959	Westerner Hotel
	1951	Westerner Hotel Westerner Smoke Shop Germaine's Beauty Salon
	1940 – 1944	No Listings

The Property was addressed at 103 South Stone Avenue from approximately 1950's through 1985, before change of address to 10 East Broadway Boulevard. The Property was used as a hotel with coffee shop and restaurant, prior to commercial redevelopment, therefore, WT did not identify RECs with historical or current uses at the Property.

5.5 Building Inspection Records

Building Inspection Records from the City of Tucson Planning and Development were obtained for the Property. A total of 30 records with dates ranging from 1965 to 2009 were reviewed for 10 East Broadway Boulevard and 103 South Stone Avenue. Copies of selected records are presented in Appendix D.

The earliest record available for review was dated 1965, and included renovation permits for the Westerner Hotel. Subsequent records reviewed for the Property through 2009 included: 1978/1979 and 1996 permits for 4th floor tenant improvement; 1997/1998 permits for construction and renovation of the lobby; and 2000 and 2003 permits for tenant improvement to suites on the 1st and 3rd floors; The most recent records, Certificate of Occupancies dated February 2009, were for June's Cornerstone Plaza and June's Corner Store.

5.6 Fire Insurance Maps

Fire Insurance maps were produced by private fire insurance map companies and depicted physical features and developments on land. These maps typically cover older sections of metropolitan areas.

A total of nine fire insurance maps depicting the Property and adjoining areas were reviewed for the years 1889 through 1968 provided by Environmental Data Resources Inc. Copies of the fire insurance maps are presented in Appendix D. The Property was not depicted on fire insurance maps prior to 1901. The Property was developed with several domestic dwellings, ranging in size and shape, in the 1901 fire insurance map. East Broadway Boulevard was identified as East Camp through 1909. Little to no changes were observed to the Property in fire insurance maps reviewed through 1919. The 1919 fire map depicted a service station, Ford Garage, with sales office on the eastern portion of the Property. The western portion remained unchanged from the domestic dwellings. The 1947 fire map depicted no changes to the eastern portion, while the western portion was developed with a gas/oil station with associated service garage. The Property was developed with The Westerner hotel, a

construction date of 1948-1949 was indicated on the drawing, in the 1949 fire map. The 1968 fire insurance map depicted little to no changes to the Property. The presence of the gas and oil station depicted in the 1947 fire map was not considered a REC to the Property.

5.7 Topographic Maps and Atlases

Topographic maps were reviewed for evidence of prior land uses or structures on or adjacent to the Property.

The USGS 7.5-Minute series *Tucson, Arizona* Quadrangle topographic map 1957, photorevised 1971 and 1975 depicted no development on the Property. Several commercial structures, churches, and schools were depicted adjacent to the Property. Interstate-10 and the Santa Cruz River were depicted approximately 0.50 miles and 0.65 miles west, respectively.

5.8 Aerial Photography

Aerial photographs depicting the Property and adjoining areas were reviewed for the years 1953 through 2014 provided by Cooper Aerial Survey Co., HistoricAerials.com and Google Earth (enlargements from 1953, 1967, 1979, 1988, 2005 and 2014 are included in Appendix D).

In the 1953 aerial photograph, the Property was developed with a multi-story structure, including roof mounted structure. By the 1967 aerial photograph, an elevated pool and associated sundeck was erected on the northeast corner of the 1st floor roof. A pathway appeared to provide access for guests from the 2nd floor to the pool and sundeck. The pool and pathway were razed by the 1979 aerial photograph, and the 2nd floor addition was constructed. Subsequent aerial photographs reviewed depicted no changes to the structure, with the exception of areas of roof repair and roof mounted air handler replacement. The Property appeared similar to that observed during the site reconnaissance.

5.9 Other Historical Sources

WT performed a computer internet search (Google) for the Property address specifically searching for environmental related information. The internet searches revealed zoning information, directions to the Property, and general real estate information.

6.0 ENVIRONMENTAL RECORDS REVIEW

WT obtained a commercial database report from GeoSearch that included information extracted from regulatory databases and lists kept by the United States Environmental Protection Agency (USEPA) and the Arizona Department of Environmental Quality (ADEQ). A copy of the database report with descriptions and release dates of the searched databases, and maps showing locations

relative to the Property, is presented in Appendix E. WT also contacted local agency representatives concerning additional records information pertaining to the Property.

6.1 Federal USEPA Records Results

The Federal records maintained by the USEPA included: the National Priorities List (NPL); Comprehensive Environmental Response Compensation Liability Information System (CERCLIS) including No Further Remedial Action Planned (NFRAP) sites; Resource Conservation Recovery Act (RCRA) database of hazardous waste generators; RCRA Treatment Storage Disposal Facilities; RCRA Corrective Action Sites (CORRACTS); federally registered engineering or administrative controls; federal brownfields sites; and the Emergency Response Notification System (ERNS) Database.

The database findings did not identify the Property in the searched Federal USEPA databases.

In the surrounding area, five sites were identified in the Comprehensive Environmental Response Compensation Liability Information System (CERCLIS) including No Further Remedial Action Planned (NFRAP) listings. The EPA concluded that "no further activity" was planned for the sites and the investigations were closed. Based on the closure status, these sites were not considered REC's to the Property.

One site was identified on the CERCLIS listing, Oliver's Cleaners, 0.43 miles northeast of the Property. The EPA conducted assessments on the site and according to the EPA, the site was under current remediation. Based on the current remediation activities and distance to the Property, this site was not considered a REC to the Property.

La Placita Village listed at 110 South Church Avenue Suite 8300, 0.12 miles west of the Property was identified in the RCRA Conditionally Exempt Small Quantity Generator, with no violations of enforcement actions taken. Based on the distance to the Property and no violations or enforcement actions taken, this site was not considered a REC to the Property.

A total of 13 federal brownfields sites were identified within a ½-mile of the Property. Various site investigations were conducted, including Phase I and II Environmental Site Assessments, with three sites requiring no remediation. Remediation or further investigations were recommended for the remaining 10 sites. Based on the distance to the Property, these sites were not considered RECs to the Property.

6.2 Arizona ADEQ Records Results

The Arizona records maintained by the ADEQ included: the Water Quality Assurance Revolving Fund (WQARF) Registry List; the Arizona Superfund Program List (ASPL); the historic Arizona CERCLA Information Data System (ACIDS); the Registered UST Database; the Leaking USTs (LUST) List; the Brownfields/Voluntary Remediation Program (VRP) List, the Database of Voluntary Environmental Mitigation Use Restrictions (VEMURs) and

Declarations of Environmental Use Restriction (DEURs); lists of Solid Waste Facilities; and the Hazardous Materials Response Incidents (HAZMAT) List.

The database findings did not identify the Property in the searched ADEQ databases.

In the surrounding area, two sites were identified in the Arizona Superfund Program List. The two identified sites are the 7th Street and Arizona Avenue and Park-Euclid. According to information obtained from the ADEQ website, both sites are currently under active remediation. Based on the current remediation activities and distance to the Property, these two sites were not considered RECs to the Property.

A total of three sites with five registered USTs were identified within the ¼-mile minimum search distance, with all five reported as removed from the ground. Based on the removed status, the USTs were not considered RECs to the Property.

A total of 19 sites with 32 reported LUST cases were identified within a ¼-mile search distance of the Property, with 24 reported as closed by ADEQ. The 8 remaining sites were characterized and remediation was recommended. Based on the ADEQ closed status and distance to the Property, these LUST sites were not considered RECs to the Property.

WT searched the ADEQ on line database of land use restrictions, the VEMUR/DEUR Database, and found no records of listed land use restrictions applicable to the Property.

Based on the information disclosed by the database report, and the locations of the identified sites relative to the Property, the database findings did not represent the potential for a REC to the Property.

6.3 Additional Records Reviews

The following local and/or additional state and federal records sources were reviewed to supplement the standard records sources discussed in Sections 6.1 and 6.2 of this report.

WT contacted the Pima County Wastewater Management Department (PCWMD) for information regarding sewer availability to the Property. According to the Pima County Map guide, and later confirmed with the PCWMD, sewer was available to the Property beginning in 1911.

WT contacted the Tucson Fire Department (TFD) for records of underground storage tanks, above ground storage tanks, storage of hazardous materials, spills and incidents at the Property. TFD had no records for the Property addressed at 63 and 103 South Stone Avenue. Two records on file for 10 East Broadway Boulevard: a self-inspection on May 12, 2009 with no violations; and a final fire inspection on February 2, 2008 for suite 108. There were no records for underground or above ground storage tanks or incidents at the Property.

WT reviewed the landfill map entitled *Identified Landfills and Permanent Transfer Stations in Eastern Pima County and Ajo, Arizona*, dated January 1996 and there were no landfills within one half-mile of the Property.

WT searched the ADEQ drywell registration records online and found no records of registered drywells on the Property.

WT searched the ADWR well registration records online and found no records of registered wells on the Property.

7.0 SUMMARY OF ASSESSMENT

7.1 Findings

This section presents our opinion regarding the probable impact to the Property from known or suspect RECs which may include current RECs, historical RECs, controlled RECs, or de minimis conditions that were identifiable from the records reviews, interviews, and site reconnaissance.

- **Leaking Transformers** – A panel of four, wall-mounted transformers on the east wall in the mechanical room provided electricity to structure. At the time of the reconnaissance, the transformers were damaged and leaking an unknown fluid onto the concrete floor. Based on the damaged and leaking condition of the transformers, WT considered this a REC to the Property.
- **Elevator Equipment** - The commercial structure contained three cable guided elevators, each with operating equipment that consisted of a drive shaft, hydraulic oil reservoir, pumps and counter weight systems. WT observed some oily staining and ponding liquid on the concrete around the base of the elevator. Based on our observations, we believe the staining was de minimis in nature and did not represent a REC.
- **Emergency Generator** - A flammable storage cabinet and various 5-gallon containers of paint, and roofing materials, along with 5-gallon metal containers of fluids and lubricants were stockpiled on the roof, west of the emergency generator. Based on the current condition and storage of diesel fuel, fluids and lubricants containers, WT considered this as a potential REC to the Property.

7.2 Conclusions and Recommendations

WT performed this ESA in general agreement with the scope and limitations of ASTM E 1527-13 of commercial property at 10 East Broadway Boulevard in Tucson, Arizona.

This assessment has revealed no evidence of RECs currently in connection with the Property, except for the following:

- Leaking Transformers - WT recommends the leaking transformer fluid be assessed for the presence of PCBs and managed accordingly.
- Emergency Generator – WT recommends the diesel fuel and all other containers be properly removed.

If additional information becomes available or known that may suggest the presence of recognized environmental conditions currently in connection with the Property, contact this firm for potential recommendations.

8.0 LIMITATIONS

WT has performed its services in accordance with its contract with the Client, utilizing the degree of skill and care practiced by firms providing similar services in the locality of the Property. No other warranty or representation, either express or implied, is made. Not every property warrants the same level of assessment. The level of inquiry for this assessment was guided by factors including the type of property subject to assessment, the expertise and risk tolerance of the user, reasonable limits on time and cost as specified in our contract, and the ability to obtain information that was reasonably ascertainable and practically reviewable. There is a point at which the cost of information obtained or the time required to gather it outweighs the likely usefulness of the information and such cost and delay may, in fact, be a material detriment to the orderly completion of transactions.

Our review of third party information was limited as set forth in the discussion presented herein and was based on our actual knowledge of the information as presented. All results and opinions contained in third party information, including public records, are the sole responsibility of the entity producing the information. An evaluation of the completeness, accuracy, or appropriateness of the test methods or procedures employed by others was outside the scope of this ESA.

This assessment was limited to the identification of conditions likely to indicate RECs in connection with the Property, according to the definitions, scope and limitations contained in ASTM E 1527-13. No environmental site assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. The performance of an assessment according to ASTM E 1527-13 is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, recognizing reasonable limits of time and cost. Therefore, if none are identified as a result of this assessment, such a conclusion should not be construed as a guaranteed absence of RECs.

The "User" or "Users" identified by ASTM E 1527-13, including the addressee, any third parties acknowledged in writing by WT, and recipients of reliance letters, are obligated to conduct the "Additional Inquiries" identified in 40 CFR §312.22 and ASTM E 1527-13 independently of the Environmental Professional. These Additional Inquiries include searches for environmental clean-up liens, an assessment of the User's specialized knowledge or experience, an assessment of the

relationship of the purchase price to fair market value, and an assessment of commonly known or reasonably ascertainable information about the property.

Nothing in this ESA, nor in our contract, subsequent correspondence, or reliance letters, shall relieve a User of this report from post-acquisition "Continuing Obligations" as required by CERCLA.

9.0 REFERENCES

9.1 Contacts

Mr. Philip A. Carhuff, Cope Properties, LLC, (520) 577-4560, pcarhuff@cca-az.com

Ms. Susan Chu Ong, CCIM, Broadstone Commercial Real Estate, (520) 623-8111

Tucson Fire Department, (520) 791-4502.

Tucson Planning and Development Department, (520) 791-4505

Pima County Regional Wastewater Reclamation Department, (520) 724-3400.

9.2 Reports and Publications

Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E 1527-13. ASTM; West Conshohocken, Pennsylvania.

Landfill Map entitled *Identified Landfills and Permanent Transfer Stations in Eastern Pima County and Ajo, Arizona*, dated January 1996.

Annual Static Water Level Basic Data Report, Tucson Basin and Avra Valley, Pima County, Arizona, 2009. City of Tucson, Tucson Water Planning and Engineering Division.

Tucson Metropolitan Street Atlas 35th Edition. Phoenix Mapping Service, a Division of Wide World of Maps, Inc.; Phoenix, Arizona.

Maps Showing Groundwater Conditions in the Upper Santa Cruz Basin Area, Pima, Santa Cruz, Pinal and Cochise Counties, Arizona-1982, Hydrological Map Series Report Number 11. Arizona Department of Water Resources; Phoenix, Arizona.

GeoSearch, Tel. (888) 396-0042, <http://geo-search.com>.

Environmental Data Resources Inc., (800) 352-0050, www.edrnet.com

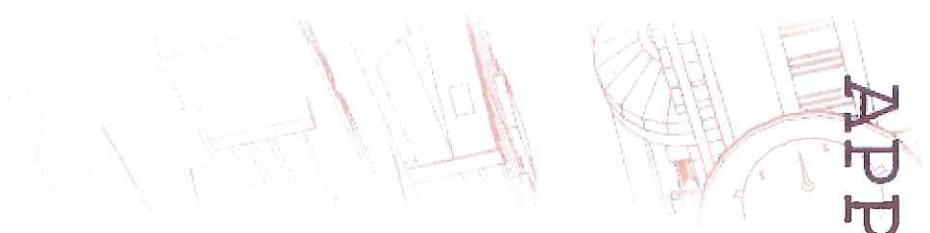
Tucson, Arizona Quadrangle, 7.5 minute series. United States Geological Survey.

Aerial photographs provided by Cooper Aerial Survey Co., Google Earth and Historic Aerials.com.

Property Record Card, available at the Pima County Tax Assessor's Office.

Polk and Cole's Southern Arizona cross-reference directories available at the Tucson Public Library, Main Branch.

APPENDIX A





NOT TO SCALE. FOR REFERENCE ONLY



Geotechnical
Environmental
Inspections
Materials



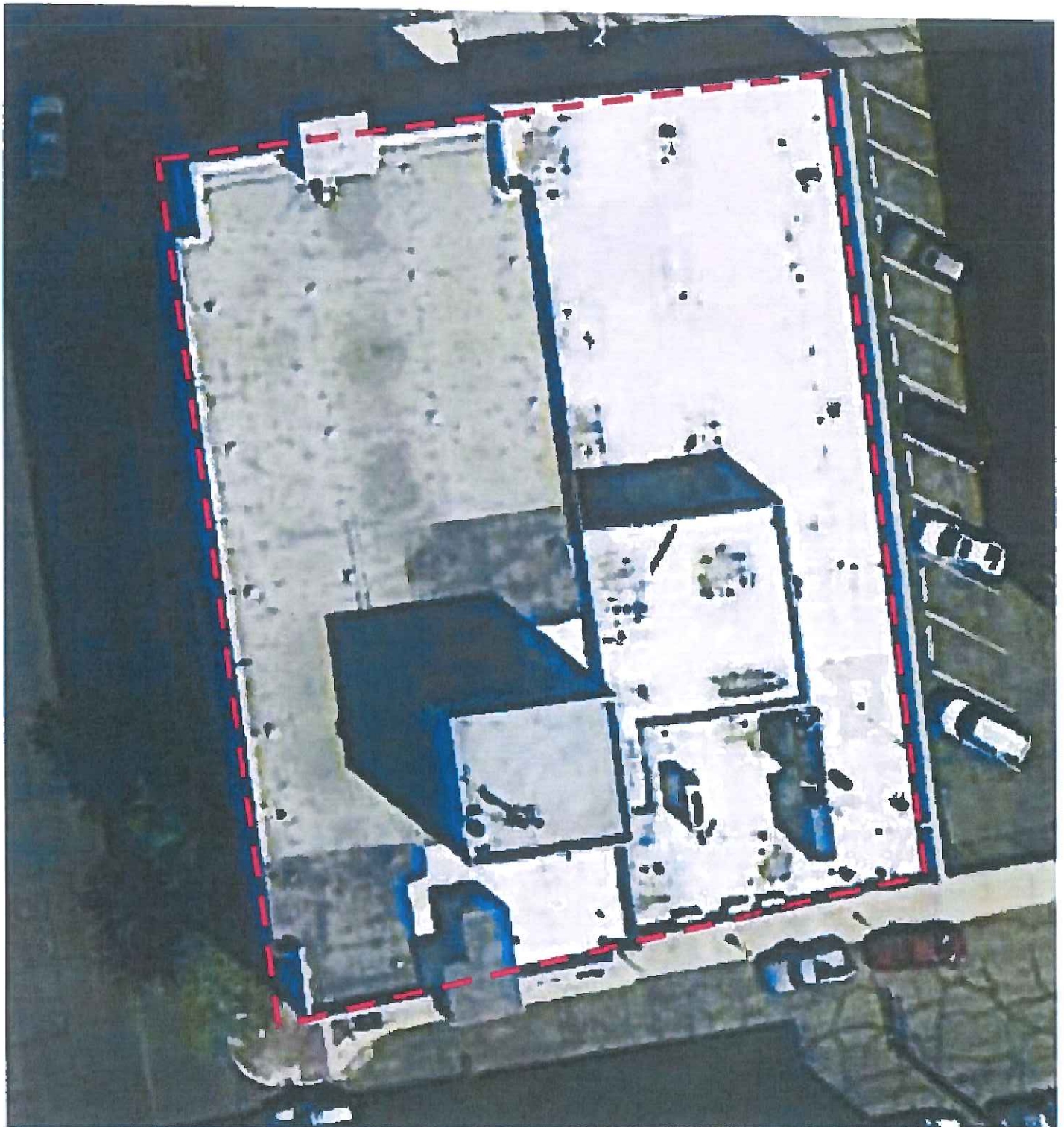
**Western
Technologies Inc.**
The Quality People
Since 1955

Commercial Property
10 E. Broadway Blvd. Tucson, AZ
WT Job No. 2985JC106

VICINITY MAP

FIGURE

1



LEGEND

--- PROPERTY LINE

NOT TO SCALE, FOR REFERENCE ONLY



*Geotechnical
Environmental
Inspections
Materials*



**Western
Technologies Inc.**
The Quality People
Since 1955

Commercial Property

10 E. Broadway Blvd., Tucson, AZ

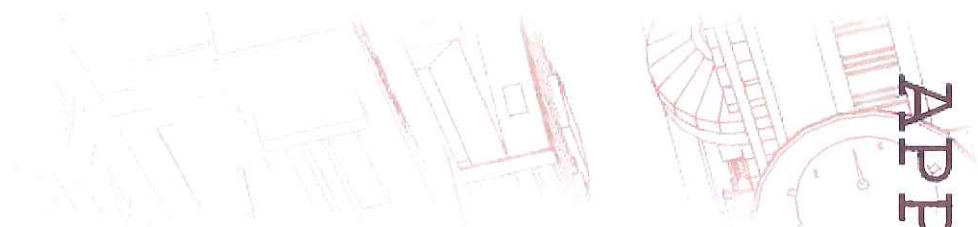
WT Job No. 2985XC106

SITE PLAN

FIGURE

2

APPENDIX B



Cope Properties, LLC
Phase I Environmental Site Assessment
10 East Broadway Boulevard
Tucson, Arizona
Photographic Log
WESTERN TECHNOLOGIES INC.

WT Job No.: 2985JC106

Date: October 7, 2015



Picture 1 – North side of the structure on the Property.



Picture 2 – South side of the structure on the Property.



Picture 3 – South side of the structure on the Property.



Picture 4 – West side of the structure on the Property..



Picture 5 – View of the lower level of the structure.



Picture 6 – View of two boilers, in the mechanical room of the structure.

Cope Properties, LLC
Phase I Environmental Site Assessment
10 East Broadway Boulevard
Tucson, Arizona
Photographic Log
WESTERN TECHNOLOGIES INC.

WT Job No.: 2985JC106

Date: October 7, 2015



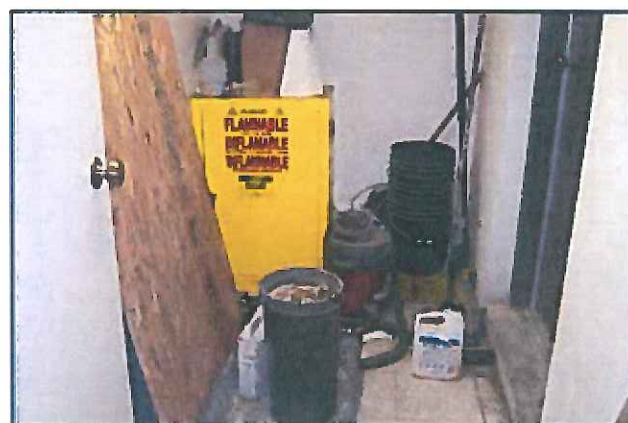
Picture 7 – View of electrical wall panels in the mechanical room.



Picture 8 – View of construction tools, equipment and supplies in storage units.



Picture 9 – View of ground level of the structure.



Picture 10 - View of flammable storage locker and associated materials.



Picture 11 – View of plastic gasoline containers full of diesel fuel.



Picture 12 – Emergency generator on the roof.

Cope Properties, LLC
Phase I Environmental Site Assessment
10 East Broadway Boulevard
Tucson, Arizona
Photographic Log
WESTERN TECHNOLOGIES INC.

WT Job No.: 2985JC106

Date: October 7, 2015



Picture 13 – Plastic and metal containers.



Picture 14 – View of the 4th floor.



Picture 15 – View of roof mounted cooling towers.



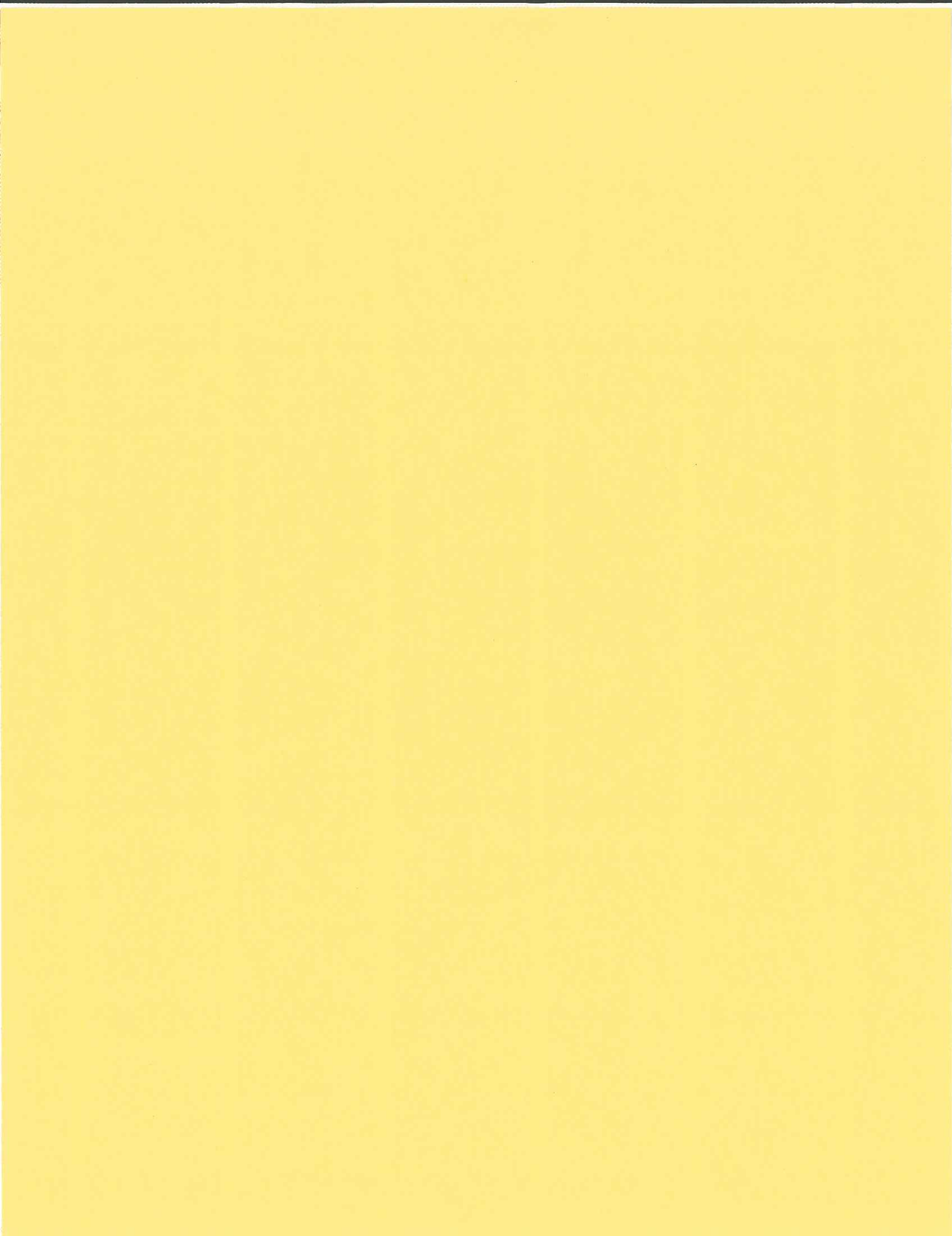
Picture 16 – View of roof mounted air handler units.



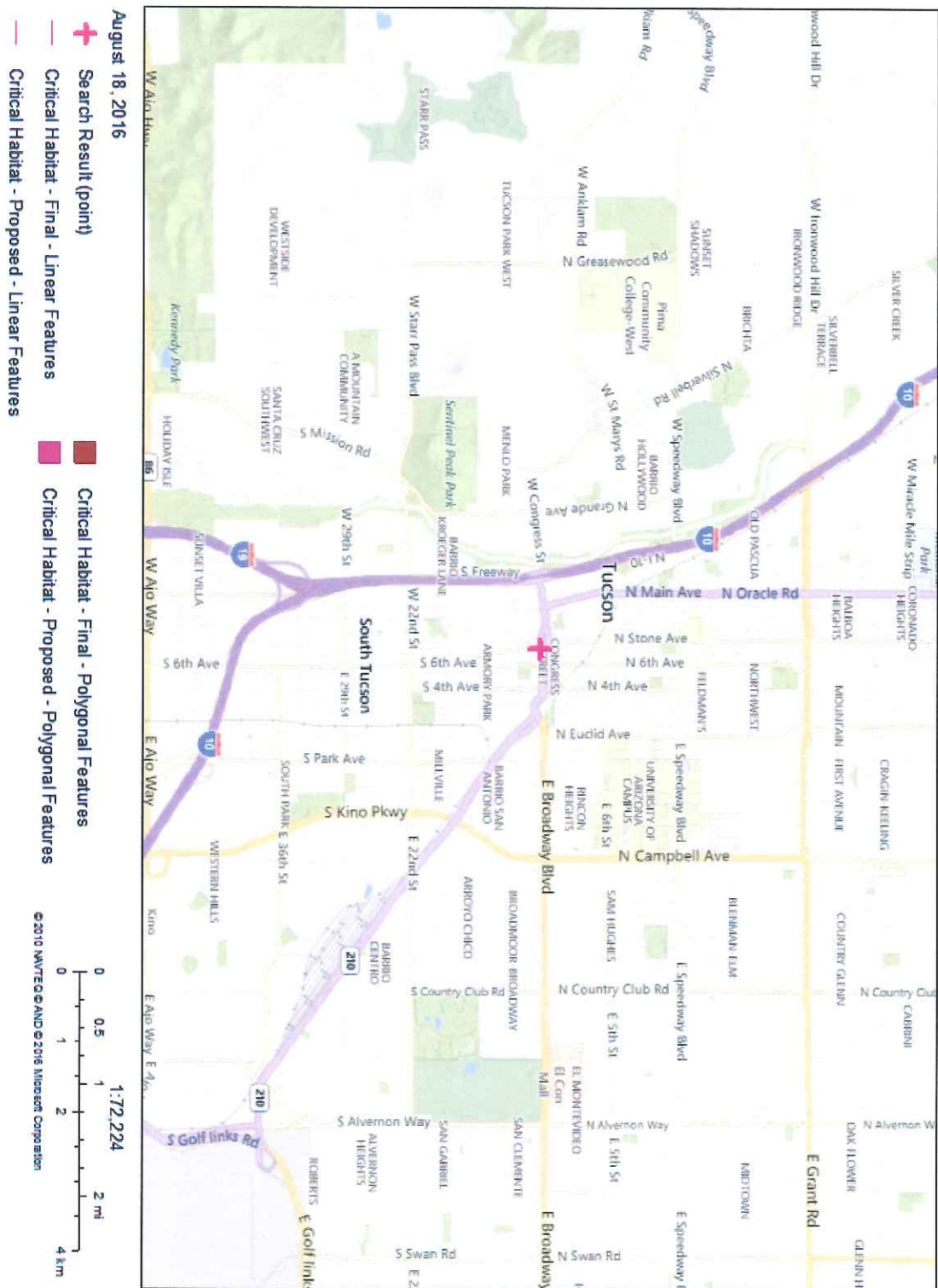
Picture 17 – View to cable elevator system, including cables and associated equipment.



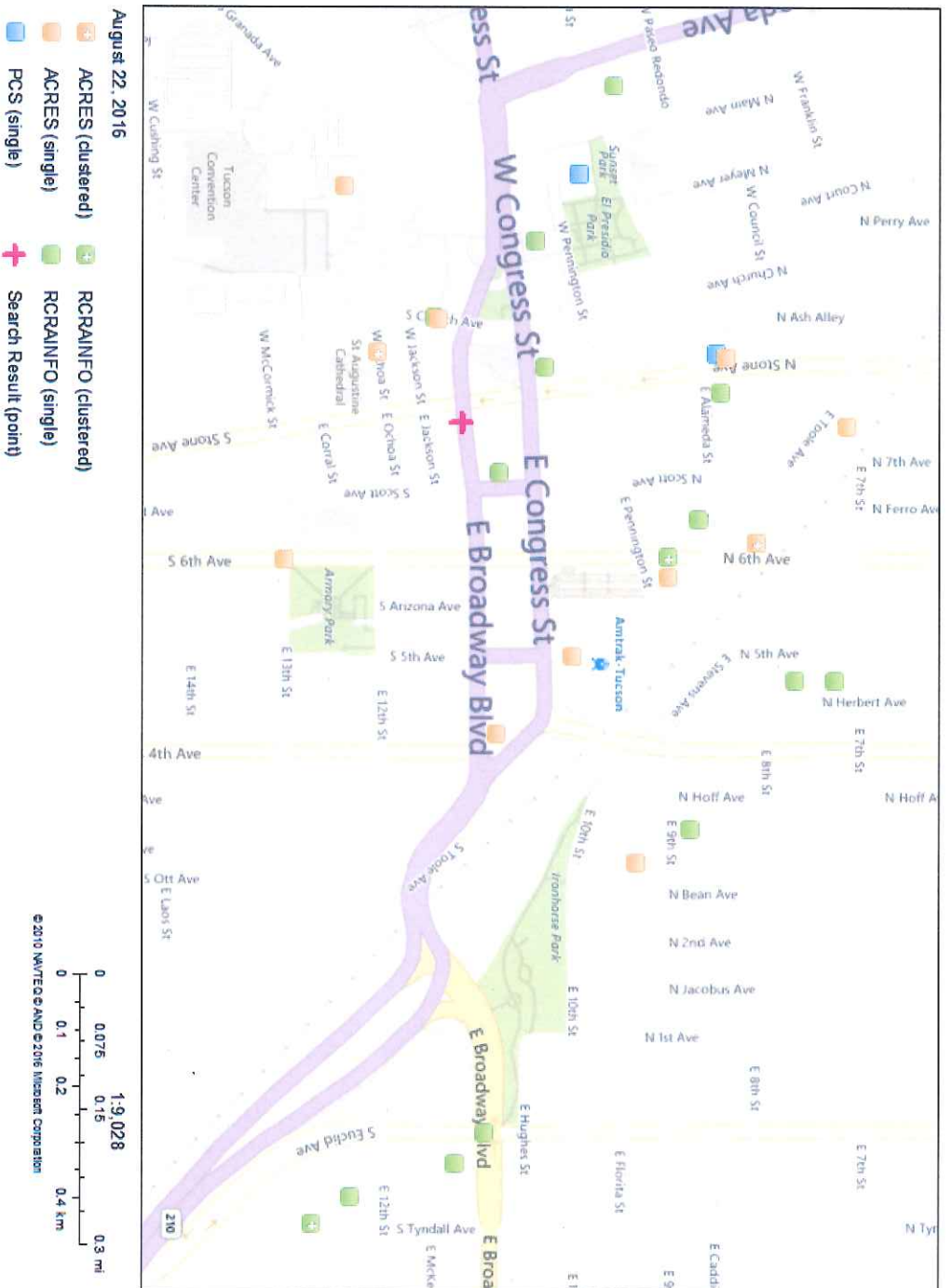
Picture 18 – View of leaking fluid from the elevator equipment.



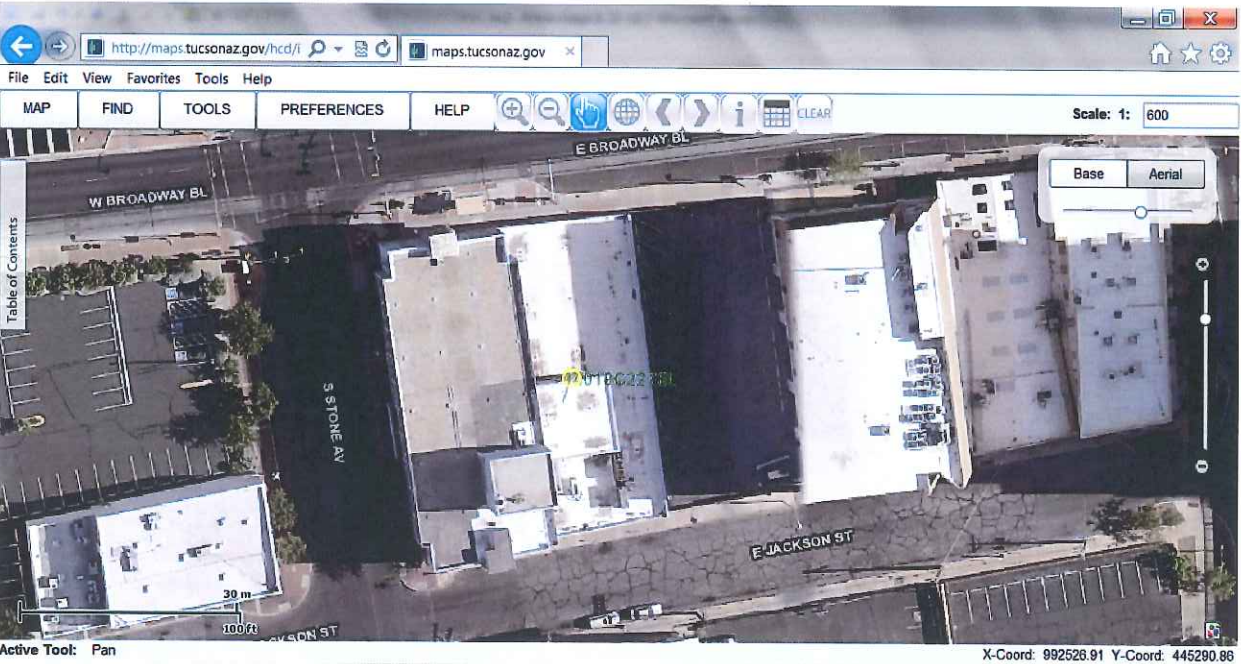
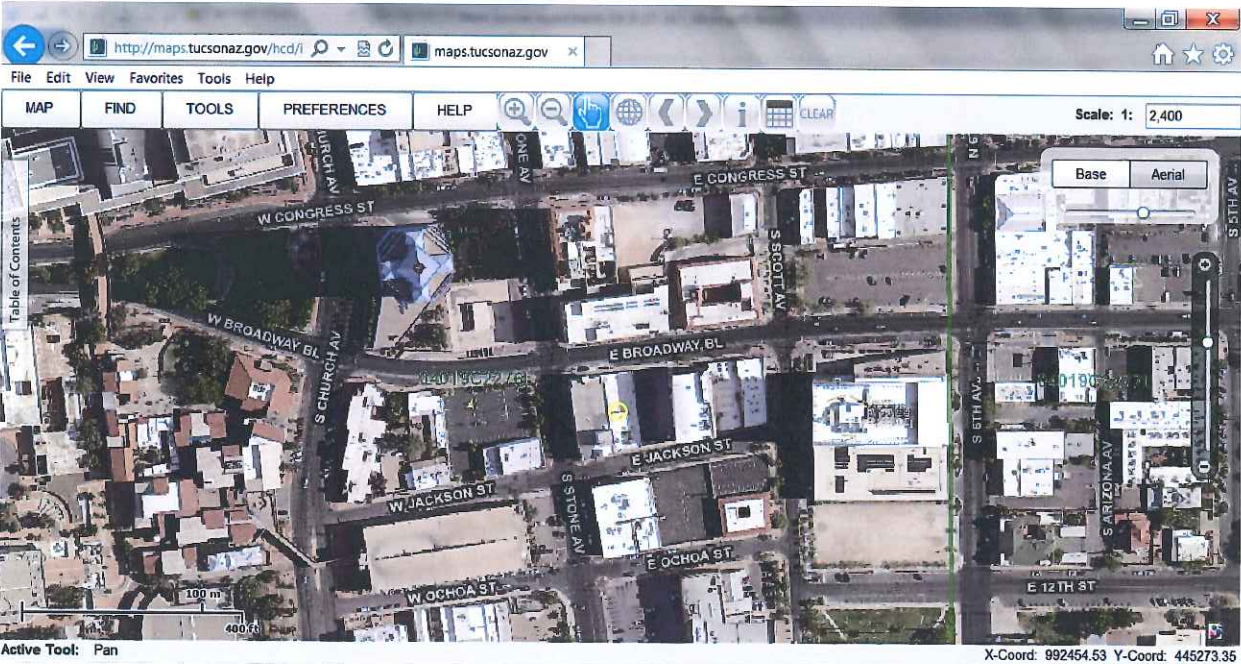
10 E. Broadway Critical Habitat Map 8/18/16



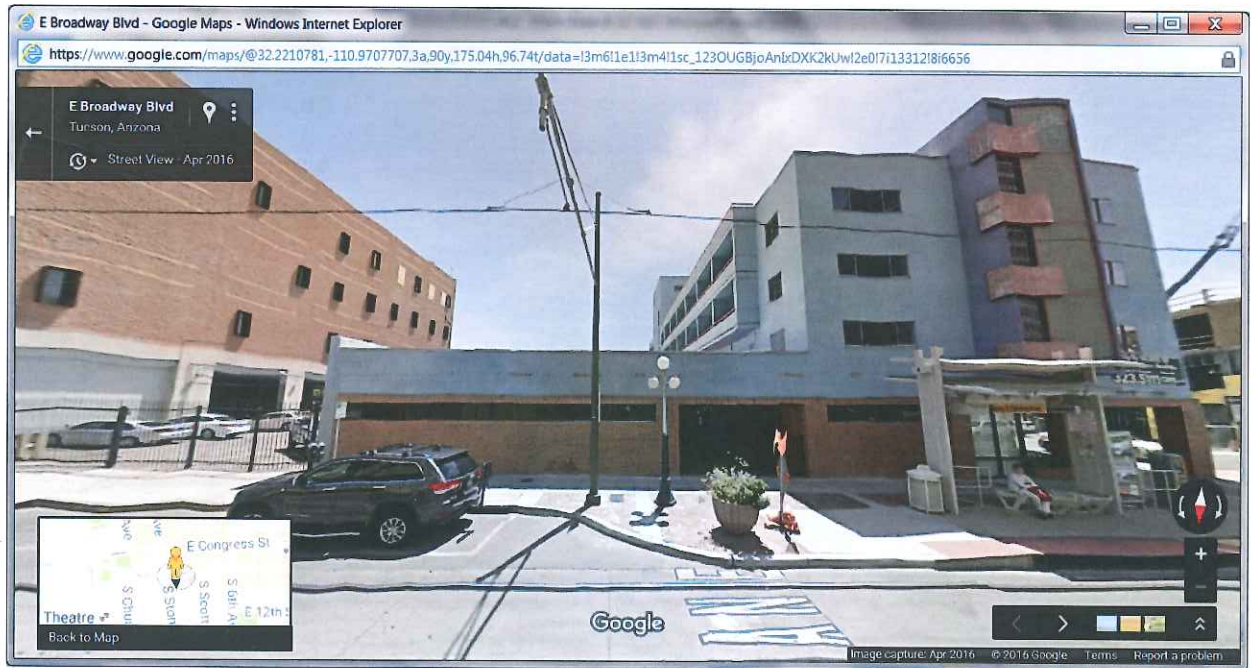
West Point Apartments EPA sites 8-22-16

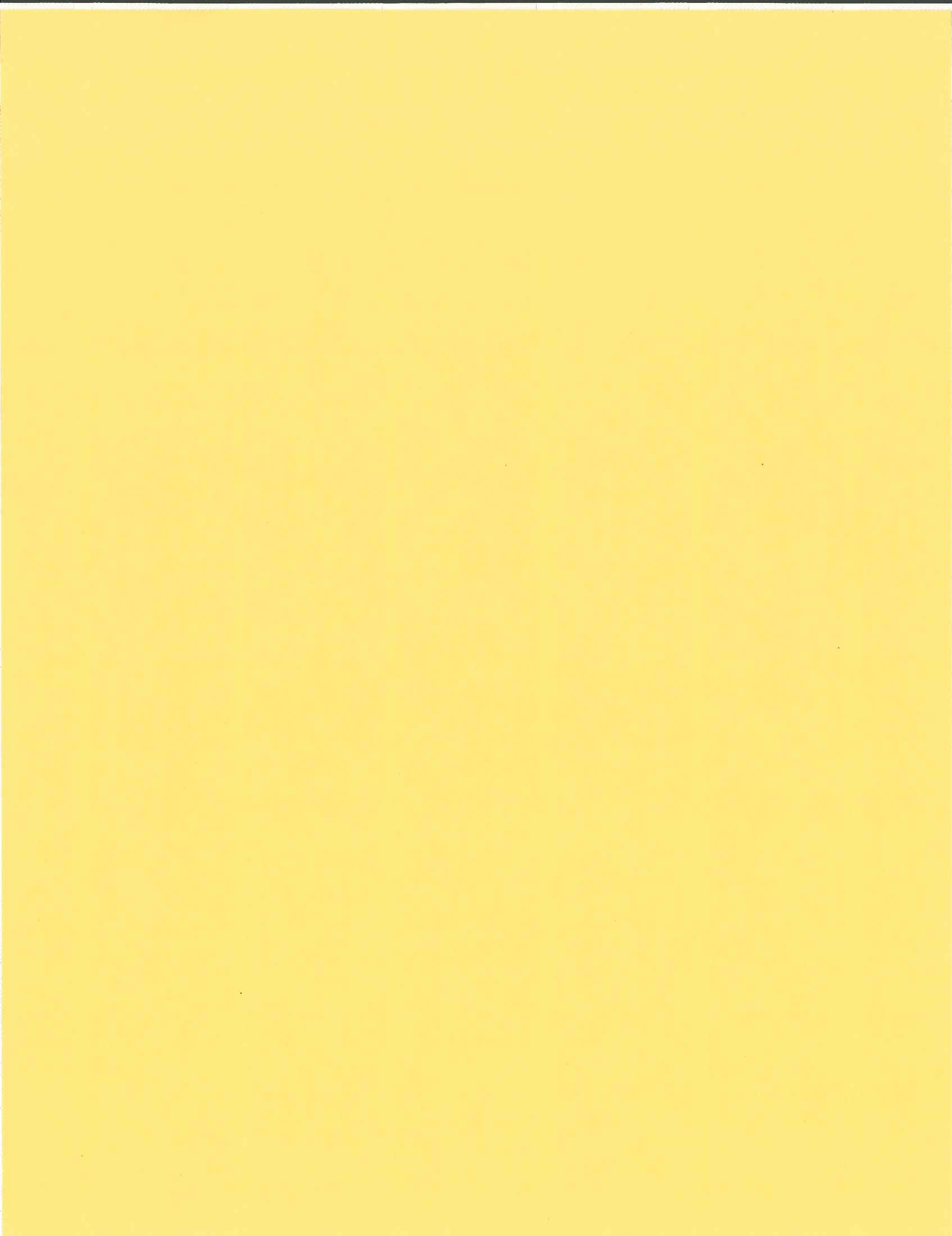


West Point Apartments 10 E. Broadway Blvd. 85701 8/22/16











CITY OF TUCSON HISTORIC PRESERVATION PROGRAM
OFFICE OF INTEGRATED PLANNING

February 18th, 2016

Rod Cook, C.F.O.
Cope Community Services, LLC
82 N. Stone Ave.
Tucson Ave. 85701

Re: LIHTC Application for Westerner Rehabilitation and New Construction, 10 East Broadway Blvd., Tucson, Arizona.

Dear Mr. Cook:

I have reviewed the current plans for this proposed LIHTC project that include rehabilitation of the 1949 Westerner Hotel building, eligible for listing in the National Register of Historic Places as a contributing property in the eligible Downtown Tucson Historic District. This project also includes construction of a new six-story apartment building adjacent to the four-story hotel.

Based on the current plans submitted for my review at this time, 1) the proposed rehabilitation of the National Register eligible Westerner building meets the Secretary of the Interior's Standards for Rehabilitation, and; 2) the construction of the new apartment building will have No Adverse Effect on the adjacent Westerner building or the eligible district because the new construction is compatible with the Westerner, and will not affect any of the qualities that make it eligible for listing in the National Register as a contributing property in the eligible Downtown Tucson Historic District.

In a letter dated 8 February 2016, the Arizona State Historic Preservation Office indicated its concurrence with a finding of No Adverse Effect of this project on the eligible Downtown Tucson Historic District or on the contributing Westerner Hotel. This project was also reviewed by the Plans Review Subcommittee of the Tucson-Pima County Historical Commission on 11 February 2016. They passed a unanimous motion recommending approval of the proposed project concept, noting that there is No Adverse Effect on the Westerner building or the eligible district.

Based on the reviews by the Arizona State Historic Preservation Office and the Plans Review Subcommittee, and also my review of the plans, it is my finding that this project will have No Adverse Effect on any historic properties.

Sincerely,

Jonathan B. Mabry, Ph.D.
Historic Preservation Officer, City of Tucson



ARCHITECTURE • PLANNING • HISTORIC PRESERVATION

4 February 2016

Robert Frankeberger
Historical Architect & Compliance Officer
State Historic Preservation Office
1108 West Washington Street
Phoenix, AZ 85007 – rfrankeberger@azstateparks.gov

CONCUR

Arizona State Historic Preservation Office
08 FEB 2016

RE: The Historic WESTERNER HOTEL – A Project of Rehabilitation and New Construction
10 East Broadway Boulevard, Tucson, AZ

Dear Mr. Frankeberger:

Cope Community Services LLC (Owner) and La Frontera Arizona (Developer) are undertaking the rehabilitation of the previously remodeled Westerner Hotel for continued use as an office building. The project also includes construction of a new six-story apartment building adjacent to the four-story hotel building within the Downtown Tucson Historic District (DTHD) and Infill Incentive District (IID). To help fund in this low-income, senior-housing project primarily for veterans, the Developer will make use of the benefits afforded by the City's Infill Incentive District and by federal Home Funding programs. These programs each entail consultation with the State Historic Preservation Office (SHPO) and the City Historic Preservation Office (CHPO). The federal funding triggers the Historic Preservation Act Section 106 consultation protocol. But first, the Developer must secure from SHPO and CHPO written concurrence on the property's eligibility and project's effect in order to submit the project concept to the Tucson Historic Preservation Commission and the Planning & Zoning Department for review and approval.

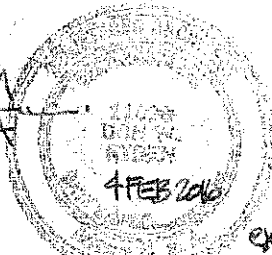
The Developer has selected Ryden Architects, Inc. of Phoenix to assist in consultation with the SHPO and CHPO as well as in research, documentation, evaluation, and design. Ryden Architects, Inc. serves as the historic preservation consultant to the prime design architects Carhuff + Cueva Architects of Tucson. The Developer must immediately submit to the City of Tucson a preliminary site plan prepared by Carhuff + Cueva Architects and letters from the CHPO and SHPO that concur with Ryden Architects' findings and evaluation:

1. The 1949 Westerner Hotel has been found to be an eligible contributing property of the National Register-eligible Downtown Tucson Historic District.
2. Upon evaluation of the preliminary design documents, it appears that the proposed rehabilitation and new construction project at the Westerner Hotel will have No Adverse Effect on the Downtown Tucson Historic District or on the contributing Westerner Hotel. The proposed undertaking apparently will not cause the Westerner Hotel to be either non-eligible for listing or subsequently de-listed from the NRHP.

Therefore, in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, and in following the Tucson IID review process, Cope Community Services and La Frontera Arizona have authorized Ryden Architects to submit to the Historic Preservation Offices, this Finding of Eligibility and Evaluation of Effect. The Owner and Developer respectfully request that the Historic Preservation Office review these evaluations and respond to Ryden and Rod Cook, CFO of Cope Community Services at 82 S. Stone Ave. in Tucson, AZ 85701 with written concurrence of Ryden Architects' finding and evaluation (see attached). Thanks for your prompt attention.

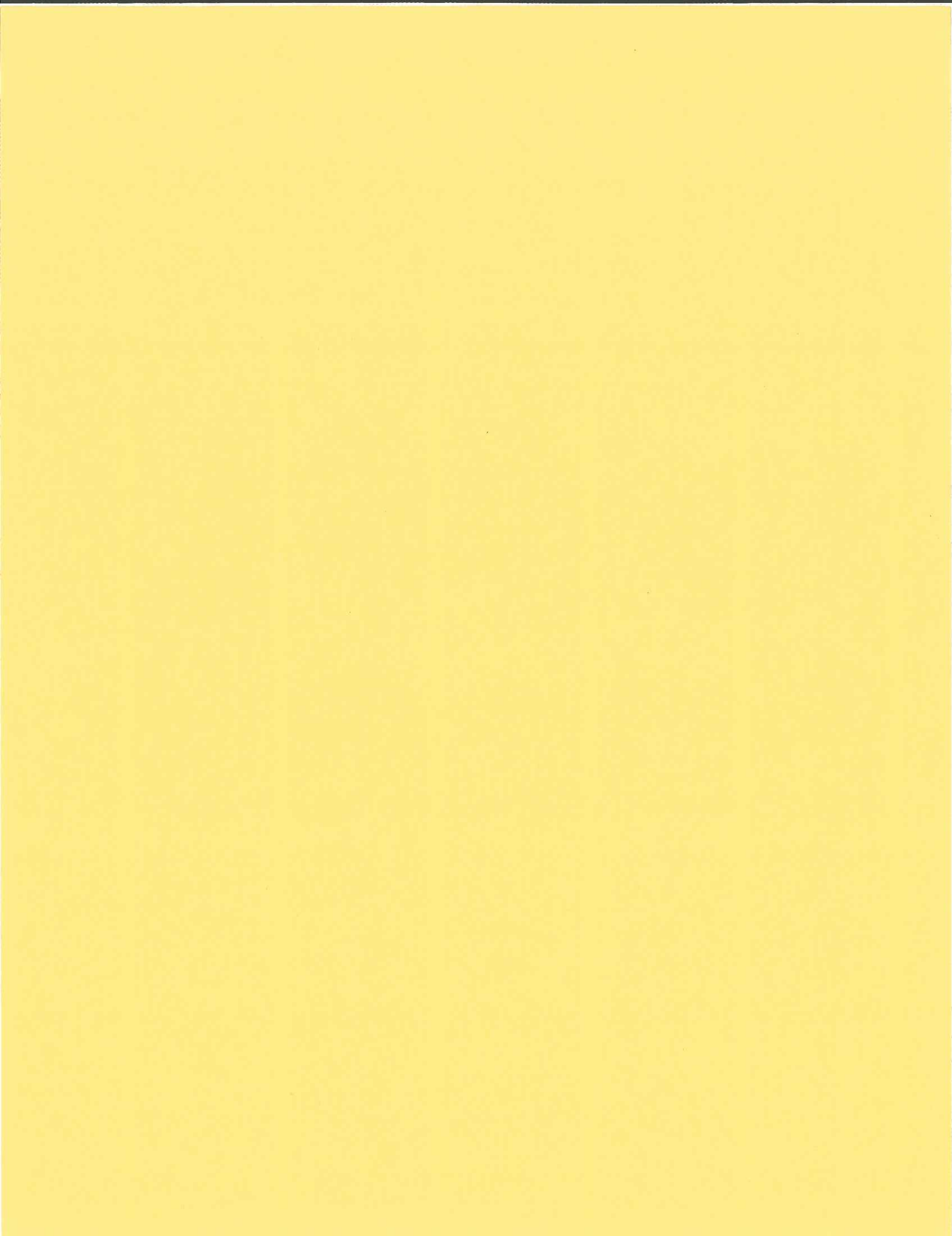
Best regards,

Don W. Ryden, AIA – President



expires 31 March 2016







July 27, 2016

Attn: Daniella Zepeda
Associate Housing Director
La Frontera of Arizona
502 W. 29th Street
Tucson, AZ 85713

RE: Acoustical Mitigation Plan for West Point Apartments 10 E Broadway Tucson, AZ.

Our firm hired Spendiarian and Wilson Acoustics and Noise Control LLC an acoustical engineer firm to mitigate or reduce the sound level for the residents of the proposed West Point Apartments in accordance with HUD prescribed environmental standards. We provided the Engineer with our proposed exterior wall types, exterior doors and exterior windows. He recommended a series of minor changes that could help noise transfer. He calculated the acoustical properties of our proposed envelope through his computer program and came to the conclusion that our current wall systems, doors and windows do mitigate the exterior noise to a comfortable and acceptable level at or under 45db.

CCA is proposing the use of two exterior wall types. The first wall type and majority of the project will be 6" solid precast concrete panels with a painted and textured exterior finish. The interior side will utilize a 1 5/8" steel furring channel at 24" on center with an air gap and insulation between the studs with a 5/8" type 'C' gypsum board covering the precast wall panels.

The second wall type will only be used in limited areas around the perimeter of the building. This wall type is comprised of 6"x 25 gauge steel stud at 16" on center with R-21 insulation and ½" sheathing and either a combination of foam insulation with stucco finish or metal or ceramic panel finish at the exterior. The interior will have two layers of type 'C' gypsum wall board.

Both of these wall types reduce the noise level to an acceptable decibel level under 45db according to the Engineer's computer modeling (see pages 4-7). All the exterior doors and windows will be high efficiency dual paned thermally broken storefront with

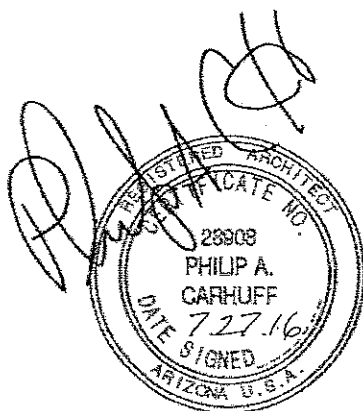


a low-e coating. The roof will be 7" thick solid concrete with foam insulation above the deck and 6" fiberglass batt insulation at the interior with a drop gypsum board 5/8" type 'C' ceiling at the highest unit. Our proposed wall types now mitigate the noise level to acceptable levels, enhance the aesthetic design of the exterior of the building and meet all applicable building codes HUD environmental standards.

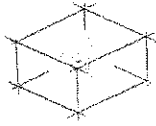
Please call or email if there are any other clarifications to be made.

Very truly yours,

Philip A. Carhuff, Principal
Carhuff + Cueva Architects, LLC



EXP. 3/31/2019



Spendiarian & Willis Acoustics & Noise Control LLC

The Form and Function of Sound

(520) 623-6003

AcousticalNoise.com

4335 N Alvernon Way, Tucson, AZ 85718

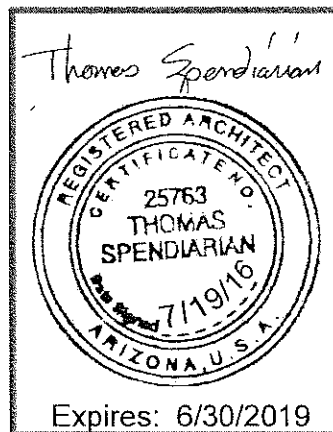
HUD Noise Abatement Plan

**The Westerner
10 East Broadway Boulevard
Tucson, Arizona**

Prepared for

**Carhuff+Cueva Architects
3149 East Prince Road, Suite 151
Tucson, AZ 85716**

**Project Manager
Philip A. Carhuff, AIA**



Lance Willis, PhD

Thomas Spendiarian, B. Arch, RA

© Spendiarian & Willis Acoustics & Noise Control LLC

R. 0, July 20, 2016

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1. Summary

The proposed Westerner residential housing site at 10 E Broadway Boulevard, Tucson, Arizona has been reviewed previously by Western Technologies with regard to the U.S. Department of Housing and Urban Development (HUD) Noise Guidebook. Background noise levels at noise sensitive locations were found to be above DNL 70 and below DNL 75. This document describes a noise abatement plan to ensure sufficient sound insulation for the building envelop.

2. Exterior Sound Insulation Analysis

2.1 Sound Transmission Class Requirements

The highest DNL found in the noise assessment prepared by Western Technologies [1] was 74 dBA. This falls in the normally unacceptable range of DNL 65 to 75 and will therefore require additional abatement measures to ensure acceptable sound levels for noise sensitive interior spaces such as residential living spaces.

HUD targets an interior background noise level of DNL 45 with the assumption that the building exterior wall system meets STC 20. In order to meet the maximum interior noise level requirement for the existing exterior DNL at the proposed site, a minimum rating of STC 30 will be needed.

2.2 Sound Insulation Prediction

Sound transmission class (STC) and outdoor indoor transmission class (OITC) ratings are calculated using INSUL created by Marshall Day Acoustics. INSUL is a program for predicting the sound insulation of walls, floors, roofs, ceilings, and windows as well as impact sound and rain noise on floors and roofs. More information about INSUL can be found at <http://www.insul.co.nz/>.

2.3 Methodology

The following sections are an acoustical analysis of the various building components as they were specified at the time of writing. The building envelope components are indexed and the sound transmission performance of these building components is modeled and presented for comparison to the required acoustical performance standards as established. Operable windows and exterior patio doors are considered proprietary components and are not modeled for STC by the INSUL software. The manufacturer of the specific door and window assemblies should provide tested STC information.

2.4 Exterior Wall Component Descriptions

Descriptions and STC ratings of the wall components are provided here. More information on the component modeling results from INSUL are given in Appendix A2.

2.4.1 Exterior Wall: 1-A

6" precast concrete wall panels, exposed exterior. Interior furred out with 25 ga 1-5/8" metal studs, cavity to be filled with semi-rigid insulation, 5/8" type C gypsum board sheathing at interior surface.

STC 59

2.4.2 Exterior Wall: 1-B

Metal framed stud walls, 2x6 25 ga. with R-21 batt insulation in the cavities, exterior finish to be a continuous EIFS stucco system, with 1-1/2" min. semi-rigid insulation over wood OSB sheathing, 5/8" type C gypsum board sheathing at interior surface.

STC 56

2.4.3 Window: 2-A

Dual pane storefront system, fixed pane. 1/4" + 0.5" air gap + 1/4"

STC 34

2.4.4 Window: 2-B

Dual pane storefront system, operable pane. 1/4" + 0.5" air gap + 1/4"

PROPRIETARY OPERABLE SYSTEM. NO DATA AVAILABLE.

2.4.5 French Doors: 3-A

Foam core metal doors with dual pane glazing. 1/4" + 0.5" air gap + 1/4"

PROPRIETARY OPERABLE SYSTEM. NO DATA AVAILABLE.

2.4.6 Roof: 4-A

7" poured in place concrete with 3" (ave.) rigid insulation and built up roofing at exterior. 3' air gap at ceiling with 6" fiberglass batt insulation and 5/8" type C gypsum board lid.

STC 87

2.5 Residential Room Index

NOTE:

Floor plans for residential rooms at level(s) 2, 3, 4, 5, 6 are identical.
 Exterior walls for levels 2, 3, 4 and for levels 5 & 6 are identical.
 Wall gross areas include window area.
 Operable window areas are NOT distinguished from fixed areas.

Rm #	Room Location	Ext. Wall Area	Mark	Window Area	Mark
X = plan repeated at levels 2,3,4, Y = plan repeated at levels 5 & 6					
X-01	N & S corners	9' x 17' = 153 sf	1-B	6'x 6.67' = 40 sf	3-A
X-10	N & S corners	9' x 17' = 153 sf	1-B	6'x 6.67' = 40 sf	3-A
Y-01	N corners	9' x 17' = 153 sf	1-B	6'x 6.67' = 40 sf	3-A
		9' X 25' = 225 sf	1-A	2' X 3.5' = 7 sf	2-A
				3.5' x 3.5' = 12.25 sf	2-A
510	S corner	9' x 17' = 153 sf	1-A	6'x 6.67' = 40 sf	3-A
		9' X 25' = 225 sf	1-A	2' X 3.5' = 7 sf	2-A
610	S corner	9' x 17' = 153 sf	1-A	6'x 6.67' = 40 sf	3-A
		9' X 25' = 225 sf	1-A	2' X 3.5' = 7 sf	2-A
				3.5' x 3.5' = 12.25 sf	2-A
XY-02	N & S center	9' x 15.3' = 138 sf	1-A	9' x 3.5' = 31.5 sf	2-A
XY-09	N & S center	9' x 15.3' = 138 sf	1-A	9' x 3.5' = 31.5 sf	2-A
XY-03	N & S @ stair	9' x 14.33' = 129 sf	1-A	14.33' x 3.5' = 50 sf	2-A
XY-08	N & S @ stair	9' x 14.33' = 129 sf	1-A	14.33' x 3.5' = 50 sf	2-A
XY-05	Courtyard N. inner	9' x 20' = 180 sf	1-A	9' x 3.5' = 31.5 sf	2-A
XY-06	Courtyard S. inner	9' x 20' = 180 sf	1-A	9' x 3.5' = 31.5 sf	2-A
XY-04	Courtyard N. outer	9' x 24' = 216 sf	1-A	9' x 3.5' = 31.5 sf	2-A
XY-07	Courtyard S. outer	9' x 24' = 216 sf	1-A	9' x 3.5' = 31.5 sf	2-A

2.6 References

[1] Western Technologies, "The Department of Housing and Urban Development (HUD) Noise Assessment." July 1, 2016.

3. Noise Abatement Plan

3.1 Minimum STC Ratings

The minimum recommended sound insulation rating for the complete residential wall assemblies is STC 30. This will provide the amount of exterior sound insulation needed to meet the HUD target for interior sound pressure level in the residential living spaces. It is recommended that all exterior wall components including windows and doors meet or exceed STC 30.

3.2 Total Wall Sound Insulation

This analysis is based on building information provided by the design team. Budgeting and cost reviews may result in changes to the building components.

The unpenetrated exterior wall and roof assemblies planned for the residential units have been analyzed and found to exceed the STC 30 minimum requirement for sound insulation. All other components including windows and doors should be rated by the manufacturer to meet or exceed STC 30.

If the above recommendations are met, the complete exterior wall assemblies including window and door penetrations will also exceed STC 30, providing sufficient acoustical insulation to maintain the interior noise level of the residential spaces below DNL 45 with respect to outdoor sound.

Appendix

A1. Glossary of Acoustical Terms and Abbreviations

A1.1 Abbreviations

AI: articulation index

ASEL: A-weighted sound exposure level

ASTC: apparent sound transmission class

dB: decibel

DNL: day - night level

FSTC: field sound transmission class

Hz: Hertz

IIC: impact insulation class

kHz: kilohertz

L_{eq}, LA_{eq}, LC_{eq}: equivalent sound pressure level

NC: noise criteria

NIC: noise isolation class

NIPTS: noise induced permanent threshold shift

NR: noise reduction

Pa: Pascal

POE: probable occupant evaluation (see room criteria)

PTS: permanent threshold shift

PWL: sound power level

QAI: quality assessment index (see room criteria)

RC: room criteria

RT₆₀: reverberation time

SEL: sound exposure level

SII: speech interference index

SIL: speech interference level

SLM: sound level meter

SPI: speech privacy index

SPL: sound pressure level

STI: speech transmission index

TTS: temporary threshold shift

A1.2 Terms

A-weighting: see frequency weighting

absorption coefficient: see sound absorption coefficient

acoustical coupler: a cavity of predetermined shape and volume used for the calibration of earphones or microphones in conjunction with a calibrated microphone adapted to measure the sound pressure developed within the cavity

anechoic room: a room whose boundaries absorb practically all of the sound incident thereon, thereby providing essentially freefield conditions

articulation index (AI): a number (ranging from 0 to 1) which is a measure of the intelligibility of speech- the higher the number the greater the intelligibility. This metric has been replaced by the Speech Intelligibility Index (SII) defined in ANSI S3.5.

average sound level: see equivalent continuous sound level

background noise: the total noise from all sound sources other than a particular sound that is of interest

band: a subsection of the frequency spectrum

C-weighting: see frequency weighting

coupler: see acoustical coupler

day-night level (DNL): the 24 hour equivalent (average) A-weighted sound pressure level. A 10 dBA penalty is incurred between the hours of 10:00 PM and 7:00 AM. The DNL system has been adopted by the U.S. Department of Housing and Urban Development, the Department of Defense, and the Federal Aviation Administration.

decibel (dB): a unit of level which denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the common logarithm (base 10) of this ratio.

diffuse field: a sound field which has statistically uniform energy density and in which the directions of propagation of the sound waves are randomly distributed. In a practical sense, the sound pressure levels at all points in the room are nearly the same except near the room

boundaries and a sound wave reaching a given point in the room is equally likely to arrive from all directions.

direct sound: sound which reaches a given location in a direct line from the source without any reflections.

equivalent continuous sound level (L_{eq}): the level of steady sound which, in a stated time period and at a stated location, has the same sound energy as the time varying sound. If frequency weighting is applied, the equivalent continuous sound level may be designated LA_{eq} to indicate A-weighting or LC_{eq} to indicate C-weighting, etc. See also frequency weighting.

field sound transmission class (FSTC): a single number rating similar to sound transmission class (STC), except that the transmission loss values used to derive this class are measured in the field. FSTC ratings are typically lower than STC ratings which are measured under laboratory conditions.

flanking path: A wall or floor/ceiling construction that permits sound to be transmitted along its surface; or any opening, which permits the direct transmission of sound through the air.

freefield: a sound field in which the boundaries have negligible effect over the frequency range of interest.

frequency: the number of times that a waveform repeats itself in a given period of time, usually one second, i.e. the number of cycles per second). Unit: Hz.

frequency weighting: a prescribed frequency dependent attenuation or amplification applied to measured sound data usually intended to better approximate the sensation of loudness in a human listener. For example, A, B, and C weighting approximate the frequency dependent shape of the equal loudness contours for soft, moderate, and loud sounds.

Hertz (Hz): unit of frequency, cycles per second.

impact insulation class (IIC): a single number metric used to compare the effectiveness of floor-ceiling assemblies in providing reduction of impact-generated sounds such as footsteps. This rating is derived from values of normalized impact sound pressure levels in accordance with ASTM E492.

insertion loss: the reduction in sound level at the location of the receiver when a noise reduction measure such as a barrier, attenuator, muffler, etc. is inserted into the transmission path between the source and receiver. Unit: dB.

level: the logarithm of the ratio of a given quantity to the reference quantity of the same kind. Levels represent physical quantities such as sound pressure on a logarithmic scale and are therefore expressed in decibels. Unit: dB.

loudness: that attribute of auditory sensation in terms of which sounds may be ordered on a scale extending from soft to loud. Unit: sone.

masking: the process by which the threshold of hearing for one sound is raised by the presence of another sound.

noise criteria (NC): a single number criteria for the HVAC or mechanical noise level in a room derived from measured octave band data. The octave bands are weighted to de-emphasize low frequencies because the human ear is least sensitive to these frequencies. This metric is not valid for outdoor measurements.

noise induced permanent threshold shift (NIPTS): the permanent hearing loss resulting from noise exposure.

noise isolation class (NIC): a single number rating derived from measured values of noise reduction between two enclosed spaces that are connected by one or more paths. This rating is not adjusted or normalized to a standard reverberation time.

noise reduction (NR): the difference in sound pressure level between any two points along the path of sound propagation, e.g. the difference in level between the interior and exterior of a building where the sound level inside is due only to exterior noise.

octave: the frequency interval between two tones whose frequency ratio is 2.

omnidirectional microphone: a microphone whose response is independent of the direction of the incident sound wave.

Pascal (Pa): a unit of pressure. 1 Pascal = 1 Newton per square meter (1 N / m²).

permanent threshold shift (PTS): a permanent increase in the threshold of hearing at a given frequency.

point source: a source that radiates sound as if from a single point.

receiver: a person (or persons) or equipment which is affected by sound.

refraction: (1) the phenomenon by which the direction of propagation of a sound wave is changed as a result of a spatial variation in the speed of sound. (2) The angular change in direction of a sound wave as it passes obliquely from one medium to another having different sound speed.

reverberation time (RT₆₀): of an enclosure, for a sound of a given frequency or frequency band, the time that is required for the sound pressure level in the enclosure to decrease by 60 dB after the source has stopped. Unit: second.

room criteria (RC, RC Mark II): an octave band metric for evaluating HVAC noise inside a room. RC is a two dimensional metric consisting of a curve number that is the arithmetic average of the 500, 1000, and 2000 Hz octave band sound pressure levels and a qualitative descriptor identifying the character of the sound spectrum. The descriptor can be (N) for neutral, (LF) for low frequency dominance (rumble), (MF) for midfrequency dominance (roar), and (HF) for high frequency dominance (hiss). In addition, acoustically induced vibration can be designated by (LFV_B) for moderate, but perceptible vibration and (LFV_A) for clearly perceptible vibration. As an example, the maximum RC prerequisite for LEED is designated as RC 37(N) indicating curve number 37 with a neutral spectrum.

Further, two intermediary metrics are used in calculating the room criteria. The quality

assessment index (QAI) is a measure of the deviation from the given RC curve. The probable occupant evaluation (POE) is based on the magnitude of the QAI and can be 'Acceptable,' 'Marginal,' or 'Objectionable.'

Sabin: a unit of measure of sound absorption; a measure of sound absorption of a surface. It is the equivalent of 1 square foot of a perfectly absorbing surface; a metric Sabin is the equivalent of 1 square meter of a perfectly absorbing surface.

sone: the unit of loudness. One sone is the loudness of a pure tone presented frontally at a frequency of 1000 Hz and a sound pressure level of 40 dB referenced to 20 micropascals.

sound absorption coefficient (α): ideally, the fraction of diffusely incident sound power that is absorbed (or otherwise not reflected) by a material or surface.

sound exposure level (SEL): over a stated time period or event, 10 times the logarithm base 10 of the ratio of the time integral of the sound pressure squared to the product of the reference sound pressure, 20 μ Pa, squared and the reference time, one second. This quantity is used to characterize single events of short duration where the averaged level (L_{eq}) is inadequate.

sound level meter (SLM): an instrument that is used to measure sound level, with a standard frequency weighting and standard exponentially weighted time averaging.

sound power level (PWL): the total acoustical power emitted from a sound source expressed in decibels relative to 10^{-12} Watts.

sound pressure level (SPL): the acoustical pressure amplitude expressed in decibels relative to 20 micropascals.

sound transmission class (STC): a single number rating used to compare sound insulation properties of walls, floors, ceilings, windows, or doors. See also field sound transmission class.

speech intelligibility index (SII): metric defined under ANSI S3.5 to quantify the intelligibility of speech under adverse listening conditions such as noise masking, spectral filtering, and reverberation. The SII is defined for a scale of 0 to 1 where values greater than 0.75 indicate good communication and values below 0.45 indicate generally poor communication conditions.

speech intelligibility test: a procedure that measures the portion of test items (such as syllables, monosyllabic words, or sentences) that are heard correctly.

speech interference level (SIL): an index for assessing the interference effects of noise on the intelligibility of speech, derived from measurements of the background noise level of contiguous octave bands; i.e. the arithmetic average of the octave band sound levels for the bands centered at 500, 1000, 2000, and 4000 Hz (four band method) or the corresponding average for the octave bands centered at 500, 1000, and 2000 Hz (three band method). If other octave bands are used they must be specified. Unit: dB.

speech privacy index (SPI): The SPI is essentially the opposite of the speech intelligibility index and is defined as $1 - \text{SII}$ and usually represented as a percentage. An SPI above 80% is considered normal privacy while an SPI above 95% would meet the requirements of confidential privacy.

speech transmission index (STI): an index for rating the intelligibility of speech that takes both noise and reverberation into account.

temporary threshold shift (TTS): a temporary increase in the threshold of hearing at a given frequency.

threshold of hearing: for a given listener, the minimum sound pressure level of a specified sound that is capable of evoking an auditory sensation. The sound reaching the ears from other sources is assumed negligible.

transducer: a device designed to receive an input signal of a given kind and to furnish an output signal of a different kind in such a manner that the desired characteristics of the input signal appear in the output signal. For example, a microphone takes an acoustic pressure as an input and produces an electrical voltage as an output that is direct proportion to the instantaneous acoustic pressure amplitude. Other common examples in noise measurement would be a loudspeaker, accelerometer, or laser Doppler vibrometer (LDV).

transmission loss: the reduction in sound level from one side of a partition to the other.

wavelength: the distance a sound wave travels in the time it takes to complete one cycle.

weighting: see frequency weighting

A2. Sound Transmission Class Ratings

Sound transmission class (STC) and outdoor indoor transmission class (OITC) ratings are calculated using INSUL created by Marshall Day Acoustics. INSUL is a program for predicting the sound insulation of walls, floors, roofs, ceilings and windows as well as impact sound and rain noise on floors and roofs. More information about INSUL can be found at [<http://www.insul.co.nz/>](http://www.insul.co.nz/).

Sound Insulation Prediction (v8.0.9)

Program copyright: Marshall Day Acoustics 2015

- Key No. 1897

Margin of error is generally within STC +/- 3 dB

Job Name: Westerner

Job No.: 16:16

Page No.:

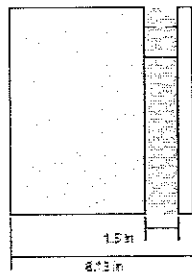
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Date: 19 Jul 16

Initials: TS

EXTERIOR CONCRETE WALL #1-A

File Name: WESTERNER conc wall 1A 1.0.0



STC 59

OTC 46

System description

Panel 1 = 1 x 8.00 in. lightweight concrete (2281.12 lb/cu ft, 104.00 psf, 104.00 psf)

Cavity: 3/8 in. (9.5 mm) Rigid Insulation (1.4 lb/cu ft) Thickness: 1.5 in. (38.1 mm, 0.0010 psf, 0.0010 psf)

Panel 2 = 1 x 0.50 in. Type D Gypsum Board (844.84 lb/cu ft, 20.36 psf, 20.36 psf)

Massed mass resonant frequency = 277 Hz

Panel Size: 5.0x13.0 ft, Mass: 43.3 lb/ft²

Frequency (Hz)	TL (dB)	TL (dB)
50	36	
63	35	33
80	31	
100	33	
125	40	37
160	45	
200	48	
250	49	49
315	49	
400	52	
500	54	54
630	57	
800	60	
1000	62	62
1250	64	
1600	66	
2000	66	67
2500	68	
3150	82	
4000	86	85
5000	90	

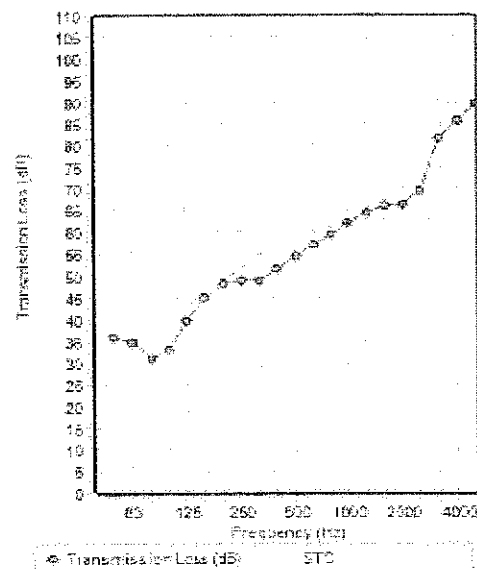


Figure A2.1. Exterior Wall: 1-A

Sound Insulation Prediction (v8.0.9)

Program copyright Marshall Day Acoustics 2015

- Key No. 1897

Margin of error is generally within STC +/- 3 dB

Job Name: Westerner

Job No.: 16:16

Page No.:

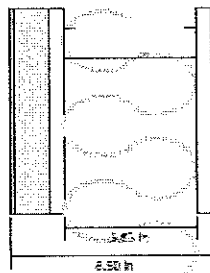
Notes:

Date: 19 Jul 16

Initials: TS

EXTERIOR STUD WALL #1-B

File Name: WESTERNER stud wall 1B 1.0.kk



STC 56

OTC 38

System description

Panel 1 : 1 x 2.05 in. Studs/EPB/CSS (p.137.3, b.13.1, E/CSS/10%, n.0.03)

Core: Steel stud (CS); Stud spacing 16 in.; EPS fiberglass (1.4 0.03) Thickness: 5.5 in. (p.02 b.13.1, R.0810, P.0.0.0)

Panel 2 : 1 x 0.01 in. Type 2 System Board (p.046.04 b.13.1, E/CSS/10%, n.0.01)

Mass-spring resonant frequency = 88 Hz

frequency (Hz)	TL(dB)	TL(wB)
50	12	
63	12	14
80	20	
100	28	
125	34	31
160	39	
200	44	
250	47	46
315	50	
400	53	
500	55	54
630	56	
800	58	
1000	59	59
1250	60	
1600	60	
2000	58	57
2500	55	
3150	58	
4000	62	61
5000	66	

Panel Size 4.2913 ft; Mass 6.0 lb/sq

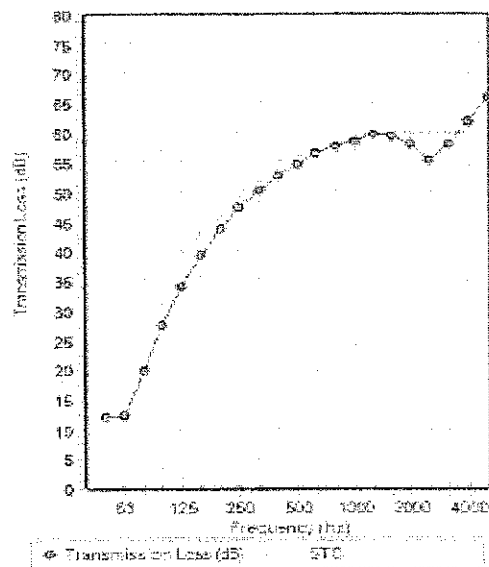


Figure A2.2. Exterior Wall: 1-B

Sound Insulation Prediction (v8.0.9)

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- Key No. 1897

Margin of error is generally within STC +/- 3 dB

Job Name: Westerner

Job No.: 16:16

Page No.:

Date: 19 Jul 16

Initials: TS

File Name: WESTERNER glazing 2A 16.16

Notes:

EXTERIOR FIXED GLAZING #2-A



STC 34

OTC 27

System description

+ 1 x 0.04 in Glass (p151.7 lbs/ft², E7.0e7, n1.516, p0.00)

+ 1 x 0.04 in Glass (p151.7 lbs/ft², E7.0e7, n1.516, p0.00)

Mass-spring-mass resonant frequency = 199 Hz

frequency (Hz)	TL(dB)	TL(dB)
50	21	
63	22	22
80	23	
100	24	
125	23	22
160	21	
200	16	
250	21	19
315	29	
400	34	
500	38	37
630	41	
800	44	
1000	45	45
1250	47	
1600	47	
2000	45	41
2500	38	
3150	40	
4000	44	43
5000	48	

Panel Size 8.5x13 ft; Mass 6.0 lb/ft²

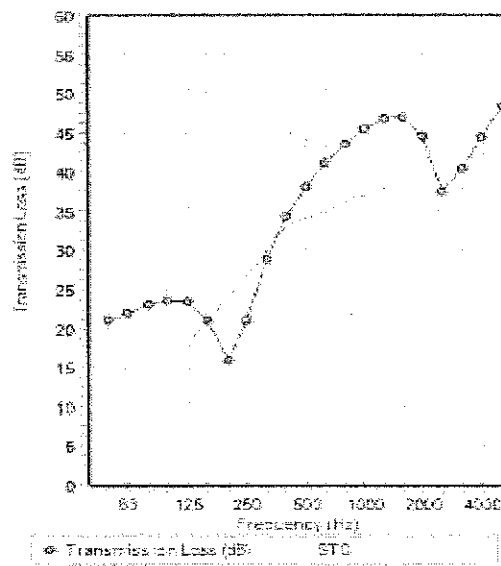


Figure A2.3. Exterior Fixed Glazing: 2-A

Sound Insulation Prediction (v8.0.9)

Program copyright Marshall Day Acoustics 2015

- Key No. 1897

Margin of error is generally within ± 3 dB

Job Name: Westamer

Job No.: 16:16

Page No.:

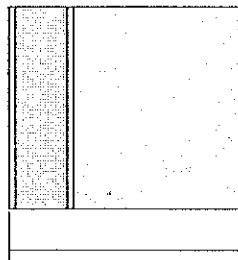
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Date: 19 Jul 16

Initials: TS

ROOF CEILING ASSEMBLY # 4-A

File Name: WESTAMER roof.cig 4A 1.0.kd



System description

Panel 1: 1 x 0.72 in DentDeck Roof Board-Polyfoam-DentDeck Roof Board

+ 1 x 7.58 in Concrete (p146.1 lbs/cu ft, E=1.5e+11, n=0.04)

Card: None; Stud spacing 24 in.; JTG fiberglass (1.4 lb/cu ft) Thickness: 5.5 in. (p22 to T3, R2600, R2600)

Panel 2: 1 x 0.63 in Type 2 System Board (p146.04 lbs/cu ft, E=1.35e+10, n=0.01)

Mass-spring resonant frequency = 15 Hz

Panel Size: 8.2x13 ft; Mass 91.4 lb/ft2

frequency (Hz)	TL(dB)	TL(dB)
50	60	
63	63	62
80	64	
100	67	
125	69	68
160	70	
200	71	
250	75	74
315	79	
400	83	
500	86	85
630	89	
800	91	
1000	91	91
1250	90	
1600	93	
2000	102	97
2500	108	
3150	119	
4000	124	122
5000	130	

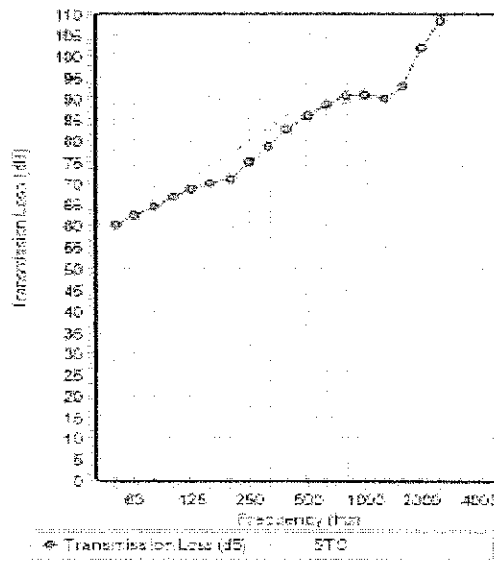


Figure A2.4. Roof Assembly: 4-A

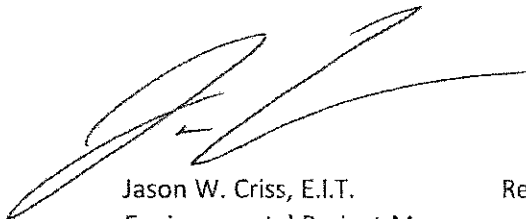
THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) NOISE ASSESSMENT

THE WESTERNER
10 East Broadway Boulevard
Tucson, Arizona
WT Job No. 2986JC060

PREPARED FOR:
La Frontera Arizona
504 West 29th Street
Tucson, Arizona

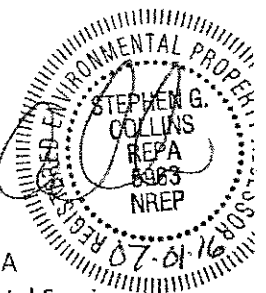
Attn: Ms. Daniella Zepeda
Associate Director of Housing

July 1, 2016



Jason W. Criss, E.I.T.
Environmental Project Manager

Reviewed By: Stephen G. Collins, REPA
Director of Environmental Services



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**Western
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Since 1955

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1.0 BACKGROUND

Western Technologies presents the findings from The Department of Housing and Urban Development (HUD) Noise Assessment for The Westerner at 10 East Broadway Boulevard in Tucson, Arizona (Property). WT implemented this project according to the scope of work, terms and conditions of WT Authorization for Service No. 2986PC044-revised, on June 14, 2016. This report has been prepared for the benefit of the HUD, La Frontera Arizona, and Carhuff and Cueva Architects and it may not be used or relied upon by any other person or entity without the prior written permission of WT.

The Property was approximately 16,800 square-feet in size and developed with an approximate 40,791 square-foot, multi-story structure; four stories above-ground and one story below-ground. Figure 1 depicts the approximate location of the Property. The Property operated as the Westerner Hotel from approximately 1951 through the mid-1970 before being turned into a multi-tenant commercial structure. WT was provided drawings completed by Grenier Engineering, Inc. entitled, *Development Package for The Westerner, 10 E. Broadway, Tucson, Arizona 85701*, and dated February 23, 2016. According to the Development Package: Building A (identified as the western building) will remain four-stories and converted to multi-tenant offices; Building B (eastern building) will be converted from offices to residences, including the addition of 5-stories on top of the existing single story.

The purpose of this Noise Assessment was to evaluate the Property for specific noise control standards as defined by US Department of Housing and Urban Development (HUD) 24 CFR Part 51B, Noise and Abatement Control. The degree of acceptability of the noise environment at the Property was determined by the outdoor day-night average sound level (DNL) measured in decibels (dB). The Property was evaluated on the exposure to three major sources of noise: aircraft, roadways, and railways. The cumulative noise exposure from the aforementioned sources was used to determine if the noise environment was *Acceptable*, *Normally Unacceptable*, or *Unacceptable*.

2.0 INTRODUCTION

The HUD, in its efforts to provide housing and a suitable living environment, was concerned with noise as a major source of pollution. To help determine potential sources of noise pollution and the contribution they may have on a site/project, HUD introduced Subpart B on Noise Abatement and Control to Part 51 of Title 24 of the Code of Federal Regulations. The Noise Assessment Guidelines (Guidelines) provide a means for assessing separately the noise produced by three operations, as well as the means to their combined effect to determine the overall noise environment at the Property.

According to the Guidelines, the parameters for conducting an assessment are defined as "determination that the proposed site/project is not within 1,000 feet of a major road or highway, 3,000 feet of a railroad, or within 15 miles of a civil or military airfield." Should the proposed site/project be within any of those parameters, determine the noise contribution each of those has on the proposed site/project. The calculated decibel reading (dB) are compared to the HUD guidelines of:

- *Acceptable* (an outdoor DNL less than 65 dB), the noise exposure may be of concern, but common building constructions will make the indoor environment acceptable and the outdoor environment will be reasonably pleasant for recreation and play;
- *Normally Unacceptable* (an outdoor DNL between 65 dB to 75dB), the noise exposure is significantly more severe: barriers may be necessary between the site and prominent noise sources; special building constructions may be necessary to ensure the protection of occupants inside; and
- *Unacceptable* (an outdoor DNL above 75 dB), the noise exposure is so severe that the construction cost to make the interior noise environment acceptable may be prohibitive and the outdoor environment would still be unacceptable.

In the Guidelines, Worksheets A, B, C, and D are provided to estimate the contribution of aircraft, roadway, and railway noise to the DNL for the Property. The worksheets provided a method to evaluate and determine the DNL for each noise source based on several factors. Completed Worksheets can be found in Appendix A of this report.

WT attempted to contact federal, state and local government agencies as well as private entities regarding information concerning aircraft, roadway and railway data. These contacts/interviews were made by telephone or via email. WT utilized approved HUD calculation values when information was not readily available or provided.

For the purpose of this assessment, several stipulations were made by WT as follows:

- Since Building B was identified as future housing, meaning occupancy 24-hours a day/365 days and the highest potential for noise exposure, distances from the site

to adjacent noise sources were determined from the north and south exterior of Building B;

- Relative distances to adjacent noise sources were determined using scaled drawings and confirmed in the field when applicable using a distance wheel when. Distances to roadways and railways were measured to the center of the lane and track, respectively;
- Roadway noise environment predictions were calculated for 2026, according to the HUD Guidelines. Aircraft and railway predications were based on current 2016 data. WT makes no guarantee that conditions may change in the future that will affect the calculations;
- Noise exposure conditions were assessed, evaluated and determined to have the most severe or long lasting effect on the Property;
- Daytime hours of 0700 – 2200 hours and nighttime hours from 2200 – 0700 hours

3.0 AIRCRAFT NOISE EVALUATION

To evaluate the Property for exposure to aircraft noise, WT identified all airports (civil and military) within 15 miles of the Property. Figure 3 in Appendix B depicts the locations of the identified airports in relation to the Property. WT determined three airports within 15 miles from the Property, as summarized in the following table.

AIRPORT	TYPE	DISTANCE
Davis-Monthan Air Force Base (DM)	Military	5.15 mile (E-SE)
Tucson International Airport (TIA)	Civil	6.75 mile (SE)
Ryan Airfield (RA)	Civil	13.10 mile (W-SW)

DNL contour maps for each of the three identified airports, in Appendix C, were obtained. Distances from the Property to each airports' 65 dB contour was determined using a ruler and scaled drawings. Consideration was giving to supersonic aircraft and loud impulse noises (explosions, military exercises, etc.) associated with DM.

The information was entered into Worksheet B, and an Aircraft Noise DNL value of 63.6 dB was obtained.

4.0 ROADWAY NOISE EVALUATION

To evaluate the Property for exposure to roadway noise, WT identified all major roadways within 1,000 feet of the Property. WT determined six major roadways within 1,000 feet from the Property. Figure 4 in Appendix B depicts the locations of the identified roadways in relation to the Property. The following table summarizes the findings:

ROADWAY	TRAVEL	DISTANCE
Broadway Boulevard	One-Way (East)	25 FT (North)
Stone Avenue	Two-Way	24 FT (West)
Congress Street	One-Way (West)	345 FT (North)
Church Avenue ^a	Two-Way	485 FT (West)
6 th Avenue	Two-Way	715 FT (East)
Pennington Street ^a	Two-Way	720 FT (North)

^a Church Avenue and Pennington Street were omitted from evaluation based on traffic volumes and distance to the Property.

Current and historical traffic volumes were obtained for each of the four roadways and used to determine future traffic volumes and amount of medium and heavy truck volumes. Historical traffic volumes, dating back to 1990, indicated an approximate 2% yearly increase, and that medium and heavy truck traffic comprised approximately 4% and 1% of total daily traffic, respectively. Traffic volume calculations for automobiles, medium, and heavy trucks in 2026 can be found in Appendix C.

The information was entered into Worksheet C, and a Roadway Noise DNL value of 72.5 dB was obtained.

5.0 RAILWAY NOISE EVALUATION

To evaluate the Property for exposure to railway noise, WT identified all major railways within 3,000 feet of the Property. WT determined two railways within 3,000 feet from the Property. Figure 5 in Appendix C depicts the locations of the identified railways in relation to the Property. The following table summarizes the findings:

RAILWAY	TYPE	DISTANCE
Sun Link Public Transportation	Public	15 FT (North)
Union Pacific Railroad Company	Private	2,140 FT (North)

Railroad and public transportation information, including diesel or electric, number of engines and cars, speed and crossings were obtained. Union Pacific crossings within the 3,000 foot radius were overpasses with the exception of 7th Avenue. This crossing was used in the evaluation due to the fact that it posed the largest impact to the Property. The Sun Link public transportation system was determined to have an insignificant noise impact to the Property.

The information was entered into Worksheet D, and a Railway Noise DNL value of 63.0 dB was obtained.

6.0 FINDINGS

The noise environment for the Property was determined by combining the contributions of three different noise sources. The contributions of aircraft, roadway and railroad noise to the total DNL at the Property. Each of the three noise sources was evaluated independent of each other, and the combined DNL from all sources is the DNL for the Property. The DNL value for the Property is used to determine the acceptability of the noise environment.

WT evaluated the Property and determined a DNL value of 74.0 dB. The DNL for the Property falls into the *Normally Unacceptable* range. The "Normally Unacceptable" noise zone includes community noise levels from above 65 decibels to 75 decibels. Approvals in this noise zone require a minimum of 5 dB additional sound attenuation for buildings having noise-sensitive uses if the day-night average sound level is greater than 65 dB but does not exceed 70 dB, or a minimum of 10 decibels of additional sound attenuation if the day-night average sound level is greater than 70 dB but does not exceed 75 dB. These levels can be achieved with the construction of sound barriers and the use of special building construction materials.

7.0 LIMITATIONS

WT has performed our services in accordance with our contract with our Client, utilizing the ordinary degree of skill and care practiced by other firms providing similar services in the locality of the site. No other warranty or representation expresses or implied, is made.

Conditions can exist within structures and below the ground surface that are not apparent visually or disclosed by sampling data. This study is limited to the conditions expressly disclosed in this report, and it does not represent the assessment or absence of any other conditions on or affecting the Site. WT's findings are based on the assumption that the sampling locations, and the resulting data, are representative of assessed conditions. WT's interpretation, discussion and opinions of the results obtained from the referenced methods, observed conditions, and tested samples are applicable only to the specifically tested locations at the times stated herein.

The regulatory standards referenced in this report are based on our knowledge of applicable regulatory standards in effect at the time the work was performed. WT cannot anticipate potential future changes to regulatory standards by appropriate governmental agencies.

8.0 REFERENCES

Chapter 5, Noise Assessment Guidelines, Department of Housing and Urban Development, Subpart B on Noise Abatement and Control, Part 51 of CFR 24.

HUD Exchange, DNL Calculator, <https://www.hudexchange.info/environmental-review/dnl-calculator/>

City of Tucson, Land Use Code, Article II. Zones Division 8, Airport Environs Zone (AEZ)

Davis-Monthan Air Force Base, Public Information, (520) 228-1110

Tucson Airport Authority, (520) 573-4820

Pima Association of Governments, (520) 495-1546

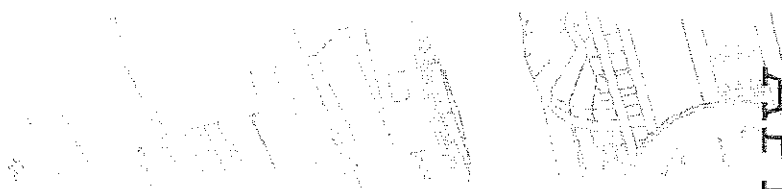
City of Tucson, Department of Transportation, (520) 791-4371

City of Tucson, Transit Service Division, (520) 791-5883

Union Pacific Railroad Company, (888) 870-8777

United States Department of Transportation, Federal Railroad Administration, U.S. DOT Crossing Inventory Form

APPENDIX A



Worksheet A
Site Evaluation

Noise Assessment Guidelines

10 East Broadway Boulevard

Site Location

HUD Noise Assessment

Program

The Westerner

Project Name

Tucson, Arizona

Locality

2986JC060

File Number

La Frontera Arizona

(520) 838-3804

Sponsor's Name

Phone

504 West 29th Street

Tucson, Arizona

Street Address

City, State

	Acceptability Category	DNL	Predicted for Operations in Year
1. Roadway Noise	Normally Unacceptable	72.5	2026
2. Airport Noise	Acceptable	63.6	2016
3. Railway Noise	Acceptable	63.0	2016
		74.0	

Value of DNL for airplane sources (see page 2 for
normalization procedure)

Final Site Evaluation (circle one)

Acceptable

Normally Unacceptable

Unacceptable

Signature

Date June 30, 2016

Clip this worksheet to the top of a package
containing Worksheets B-E and Worksheets 1-7
that are used in the site evaluations

Worksheet B
Aircraft Noise

Noise Assessment Guidelines

List all airports within 15 miles of the site:

1. Davis-Monthan Air Force Base
2. Tucson International Airport
3. Ryan Air Field

- DNL contour maps are located in Appendix C

- Assumed supersonic aircraft operations at Davis-Monthan Air Force Base

Necessary Information:

Airport 1 Airport 2 Airport 3

1. Are DNL, NEF or CNR contours available? (yes/no)

Yes Yes Yes

2. Any supersonic aircraft operations? (yes/no)

Yes No No

- Distances referenced in Worksheet B are in miles

3. Estimating supersonic contours from Figure 3:

- Section 3 left blank due to the availability of aforementioned DNL contour maps

a. number of nighttime jet operations

b. number of daytime jet operations

c. effective number of operations (10 times a + b)

d. distance A for 65 dB

70 dB

75 dB

e. distance B for 65 dB

70 dB

75 dB

4. Estimating DNL from Table 2

a. distance from 65 dB contour to flight path, D^1

1.2 0.5 1.0

b. distance from NAL to flight path, D^2

3.1 3.7 13.0

c. D^2 divided by D^1

2.6 7.4 13.0

d. DNL

63* 55 55

5. Operations projected for what year?

2016 2016 2016

6. Total DNL from all airports

63.6

* 8 dB are added to the DNL for Davis-Monthan based on supersonic aircraft operations

Signature

June 30, 2016

Date

Worksheet C
Roadway Notes

Page 1

Noise Assessment Guidelines

List all major roads within 1000 feet of the site:

1. East Broadway Boulevard
2. South Stone Avenue
3. East Congress Street
4. South 6th Avenue

- Traffic lights are not considered stop signs because there is usually traffic moving on one street or another

- Traffic predictions are based on a constant 2% increase in traffic flow

Necessary Information

1. Distance in feet from the NAD to the edge of the road:

a. nearest lane

b. farthest lane

c. average (effective distance)

2. Distance to stop sign

3. Road gradient in percent

4. Average speed in mph:

a. Automobiles

b. heavy trucks - uphill

c. heavy trucks - downhill

5. 24 hour average number of automobiles and medium trucks in both directions (ADT):

a. automobiles

b. medium trucks

c. effective ADT (a + (10b))

6. 24 hour average number of heavy trucks:

a. uphill

b. downhill

c. total

7. Fraction of nighttime traffic (50pm to 7am):

8. Traffic projected for what year?

Road 1	Road 2	Road 3	Road 4
10	81	330	700
40	97	360	730
25	89	345	715
0	0	0	0
2	2	2	2
25	25	25	25
25	25	25	25
25	25	25	25
25673	14462	20170	10497
1283	723	1008	524
38510	21694	30255	15746
--	--	--	--
--	--	--	--
256	144	201	104
15	15	15	15
2026	2026	2026	2026

- Medium trucks (between 10,000 and 26,000 pounds) account for 4% of ADT

- Heavy trucks (more than 26,000 with 3 or more axles, including city buses) account for 1% of ADT

- Roadway gradient and fraction of nighttime traffic based on HUD approved calculation values

- Roadway gradient does not exceed 2%, therefore uphill and downhill heavy truck traffic does not need to be considered

Worksheet C
Roadway Noise

Page 2

Noise Assessment Guidelines

Adjustments for Automobile Traffic

	9 Stop and-go Table 3	10 Average Speed Table 4	11 Night- Time Table 5	12 Auto ADT (line 5c)	13 Adjusted Auto ADT	14 DNL (Workchart 1)	15 Barrier Attenuation	16 Partial DNL
Road No. 1	--	x 0.21	x 1.0	x 38510	= 8087	72	--	= 72
Road No. 2	--	x 0.21	x 1.0	x 21694	= 4556	63	--	= 63
Road No. 3	--	x 0.21	x 1.0	x 30255	= 6354	54	--	= 54
Road No. 4	--	x 0.21	x 1.0	x 15746	= 3307	45	--	= 45

Adjustments for Heavy Truck Traffic

	17 Gradient Table 6	18 Average Speed Table 7	19 Truck ADT 2	20	21	22 Stop and-go Table 8	23 Night- Time Table 5	24 Adjusted Truck ADT	25 DNL (Work- chart 2)	26 Barrier Attn.	27 Partial DNL
Uphill	--	x 0.81	x 256	= 207							
Road No. 1				Add 207	x --	x 1.0		207	72	--	= 72
Downhill		x									
Uphill	--	x 0.81	x 144	= 117							
Road No. 2				Add 117	x --	x 1.0		117	63	--	= 63
Downhill		x									
Uphill	--	x 0.81	x 201	= 163							
Road No. 3				Add 163	x --	x 1.0		163	54	--	= 54
Downhill		x									
Uphill	--	x 0.81	x 104	= 85							
Road No. 4				Add 85	x --	x 1.0		85	45	--	= 45
Downhill		x									

Combined Automobile & Heavy Truck DNL

Road No. 1 72 Road No. 2 63 Road No. 3 54 Road No. 4 45 Total DNL for All Roads 72.5

Signature

Date June 30, 2016

Worksheet D
Railway Noise

Page 1

Noise Assessment Guidelines

List All Railways within 3000 feet of the site:

- 1 Sun Link Public Transportation
- 2 Union Pacific Railroad Company
- 3 N/A

- Sun Link operates a completely electrified system

- Number of railcars per day and diesel locomotives per train based on HUD approved calculation values

Necessary Information:

	Railway No. 1	Railway No. 2	Railway No. 3
1. Distance in feet from the N4L to the railway track:	15	2145	
2. Number of trains in 24 hours:			
a. diesel	--	40	
b. electric	30	--	
3. Fraction of operations occurring at night (10 p.m. - 7 a.m.):	0	40	
4. Number of diesel locomotives per train:	--	2	
5. Number of rail cars per train:			
a. diesel trains	--	50	
b. electrified trains	3	--	
6. Average train speed:	20	30	
7. Is track welded or bolted?	Welded	Welded	
8. Are whistles or horns required for grade crossings?	No	Yes	

- Whistles or horns used by Sun Link at the Broadway and Stone intersection does not factor into the calculations

- Union Pacific Railroad crossing at 7th Avenue (South of the Property) does factor into the calculations

Worksheet D
Railway Noise

Page 2

Noise Assessment Guidelines

Adjustments for Diesel Locomotives

	9 No. of Locomotives 2	10 Average Speed Table 9	11 Horns (enter 10)	12 Night- time Table 5	13 No. of Trains (enter 24)	14 Adj. No. of Ops.	15 DNL Worksheet 3	16 Barrier Adj.	17 Partial DNL
Railway No. 1	X	X	X	X	X	X	X	X	X
Railway No. 2	1	1	10	1.96	40	784	63	--	63
Railway No. 3	X	X	X	X	X	X	X	X	X

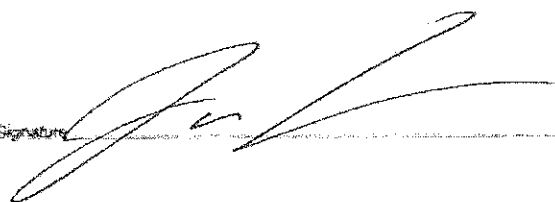
Adjustments for Railway Cars or Rapid Transit Trains

	18 Number of Cars 50	19 Average Speed Table 10	20 Exhaust Factor (enter 4)	21 Night- time Table 5	22 No. of Trains (Line 24 or 26)	23 Adj. No. of Ops.	24 DNL Worksheet 4	25 Barrier Adj.	26 Partial DNL
Railway No. 1	0.06	0.44	--	0.43	30	0.35	N/A	--	N/A
Railway No. 2	X	X	X	X	X	X	X	X	X
Railway No. 3	X	X	X	X	X	X	X	X	X

Combined Locomotive and Railway Car DNL

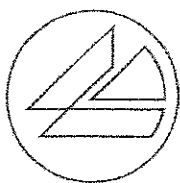
Railway No. 1	N/A	Railway No. 2	63	Railway No. 3	N/A	Total DNL for all Railway	63.0
---------------	-----	---------------	----	---------------	-----	---------------------------	------

WT evaluated the Sun Link Public Transportation system using the aforementioned adjustments and determined that, based on the adjustments number of operations was less than 1, the effects of noise on the Property would be insignificant.

Signature 

Date June 30, 2016

APPENDIX B



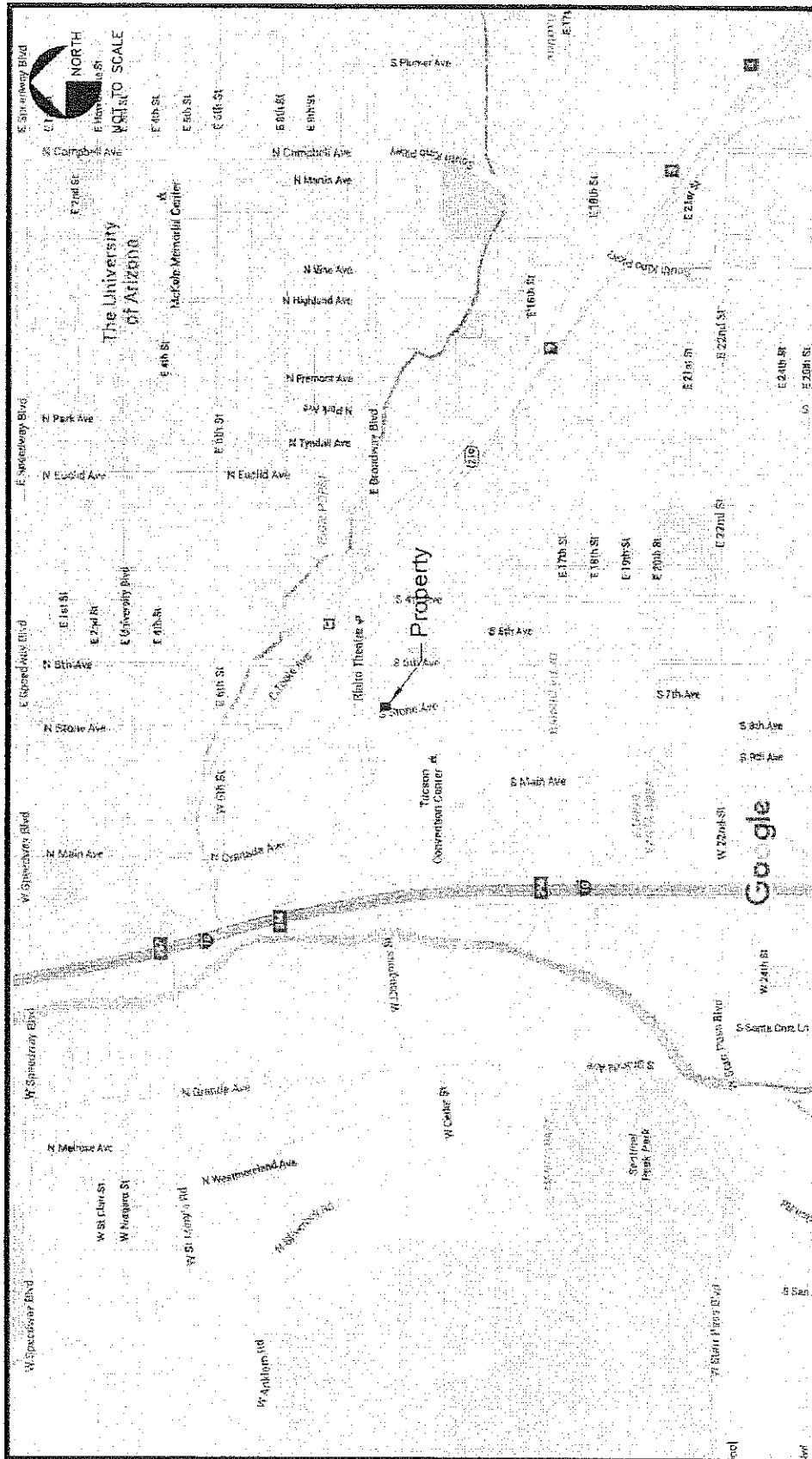


FIGURE 1. PROPERTY LOCATION MAP
HUD NOISE ASSESSMENT
 The Westerner
 10 East Broadway Boulevard
 Tucson, Arizona

**Geotechnical
Environmental
Inspections
Materials**



**Western
Technologies Inc.**
 The Quality People
 Since 1955

Google

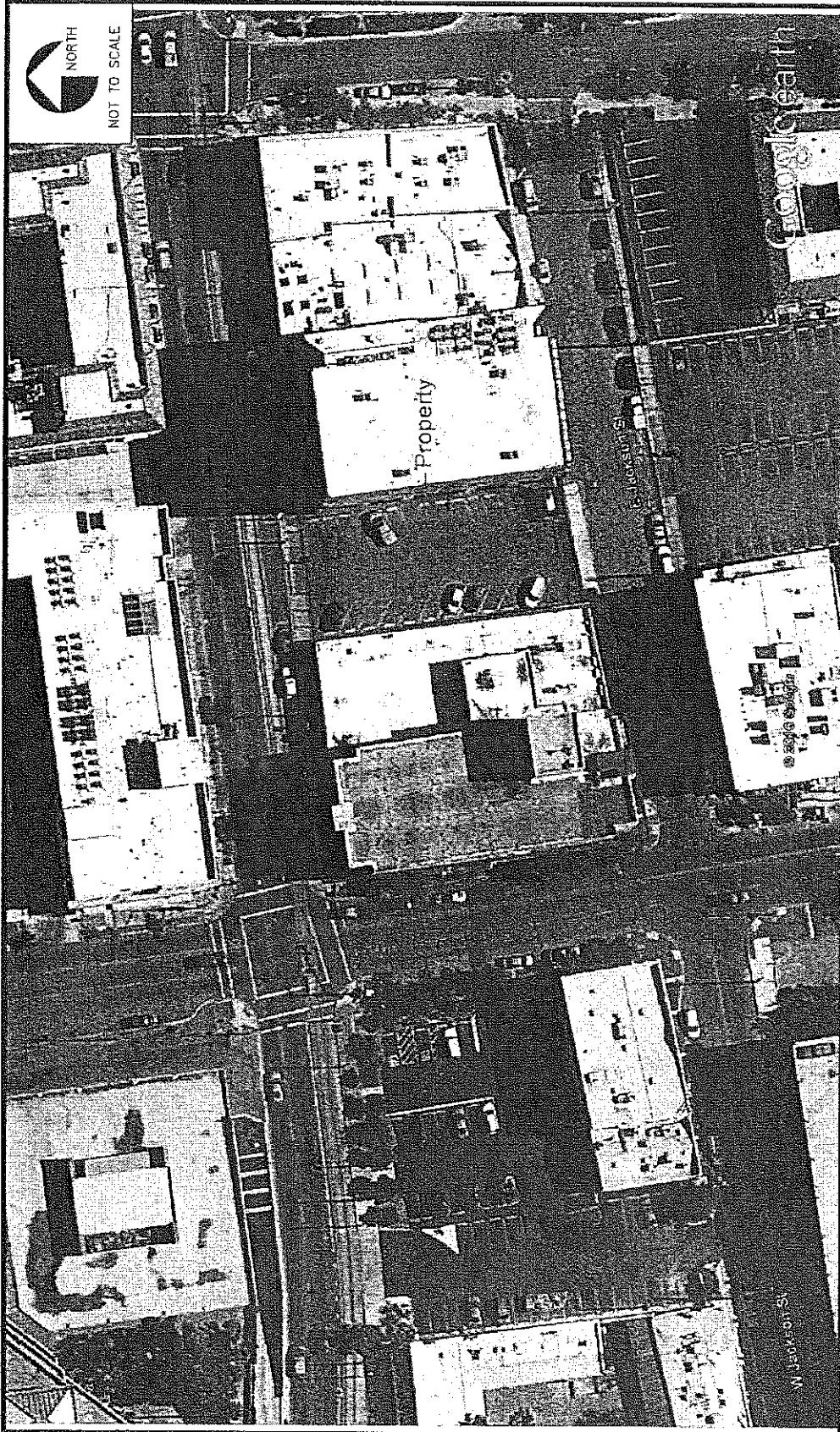
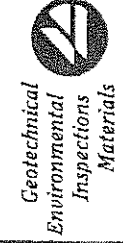


FIGURE 2: 2016 AERIAL PHOTOGRAPH
 HUD NOISE ASSESSMENT
 The Westerner
 10 East Broadway Boulevard
 Tucson, Arizona

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Google earth

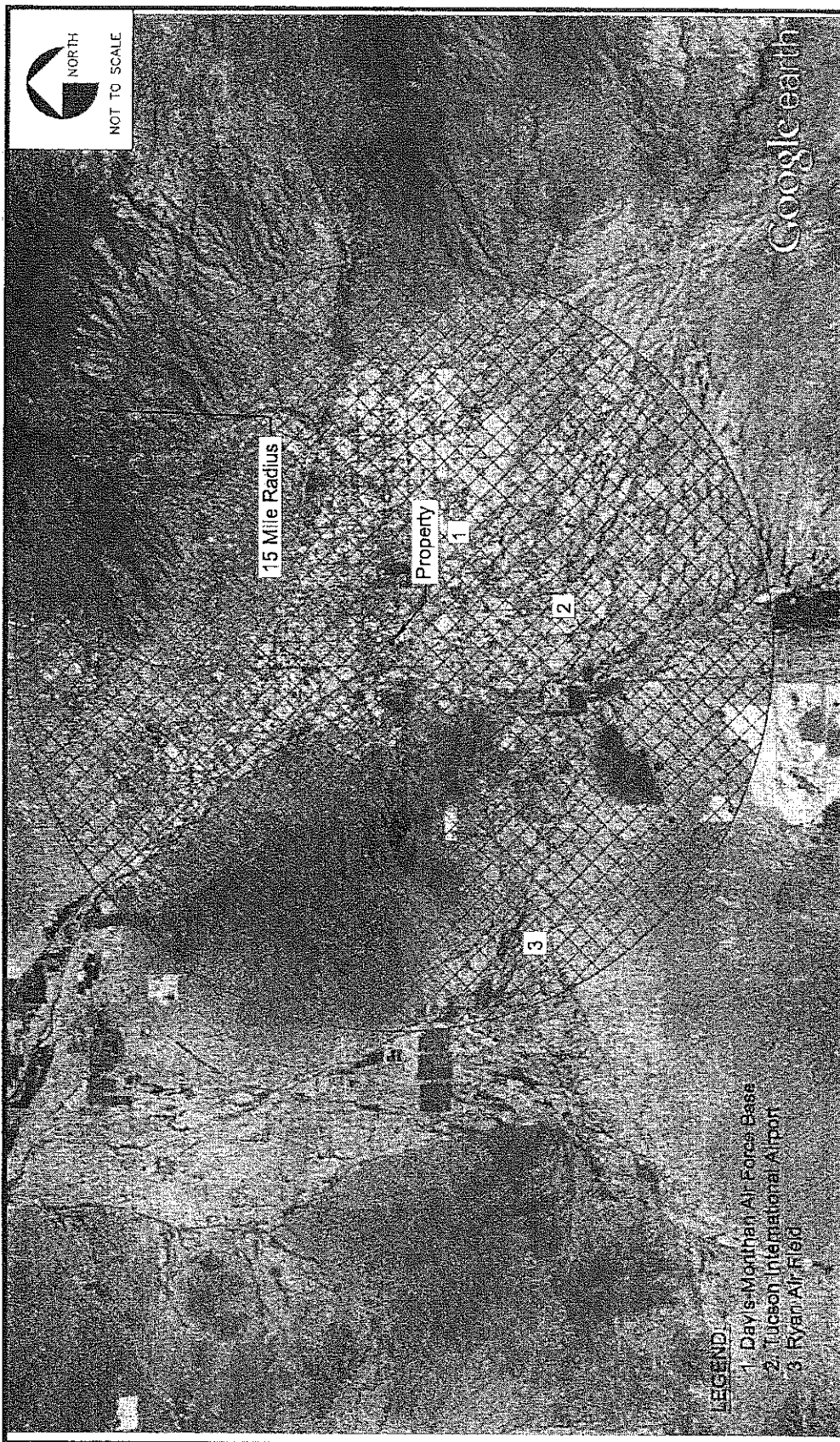


FIGURE 3. AIRCRAFT NOISE EVALUATION

HUD NOISE ASSESSMENT
 The Westerner
 10 East Broadway Boulevard
 Tucson, Arizona

WT Job No. 2986JC060

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 Environmental
 Inspections
 Materials**



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Google earth



LEGEND:

1. E Broadway Blvd
2. S Stone Ave
3. E Congress St.
4. S 6th Ave

**Geotechnical
Environmental
Inspections
Materials**

**Western
Technologies Inc.**
The Quality People
Since 1955


FIGURE 4. ROADWAY NOISE EVALUATION
HUD NOISE ASSESSMENT
The Westerner
10 East Broadway Boulevard
Tucson, Arizona

WT Job No. 2986JC060



FIGURE 5. RAILWAY NOISE EVALUATION
 HUD NOISE ASSESSMENT
 The Westerner
 10 East Broadway Boulevard
 Tucson, Arizona

*Geotechnical
Environmental
Inspections
Materials*



**Western
Technologies Inc.**
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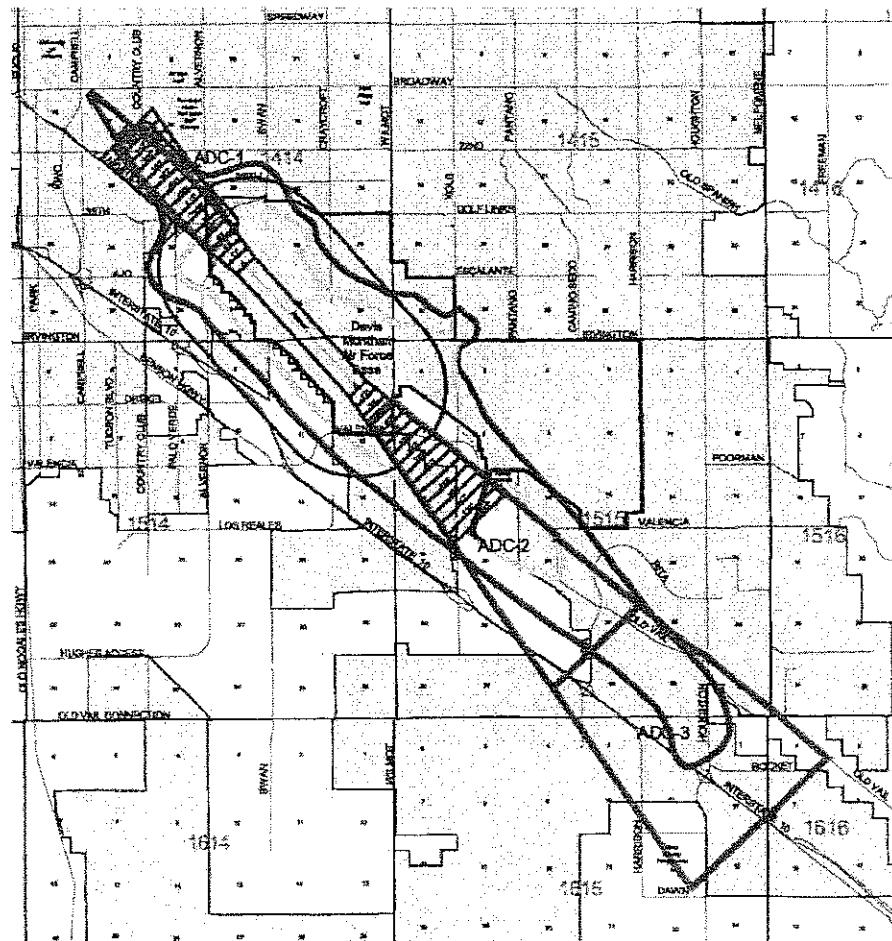
- LEGEND:**
- 1. Sun Link Public Transportation
 - 2. Union Pacific Railroad Company

APPENDIX C



CITY OF TUCSON LAND USE CODE
ARTICLE II. ZONES
DIVISION 8. OVERLAY ZONES
AIRPORT ENVIRONS ZONE (AEZ)

Sec. 2.8.5.11



Davis Monthan Airport
Environs Zone

- Legend
- Airport Hazard District (Height Zones)
 - ADC's
 - 65 Noise Contour (NCD-A)
 - 70 Noise Contour (NCD-B)
 - Davis Monthan Boundary
 - City of Tucson



Map 2.8.5.2-I AEZ Base Map

MAPS ORIGINALLY ADOPTED BY THE MAYOR AND COUNCIL,
APRIL 16, 1990, BY ORDINANCE NO. 7399.

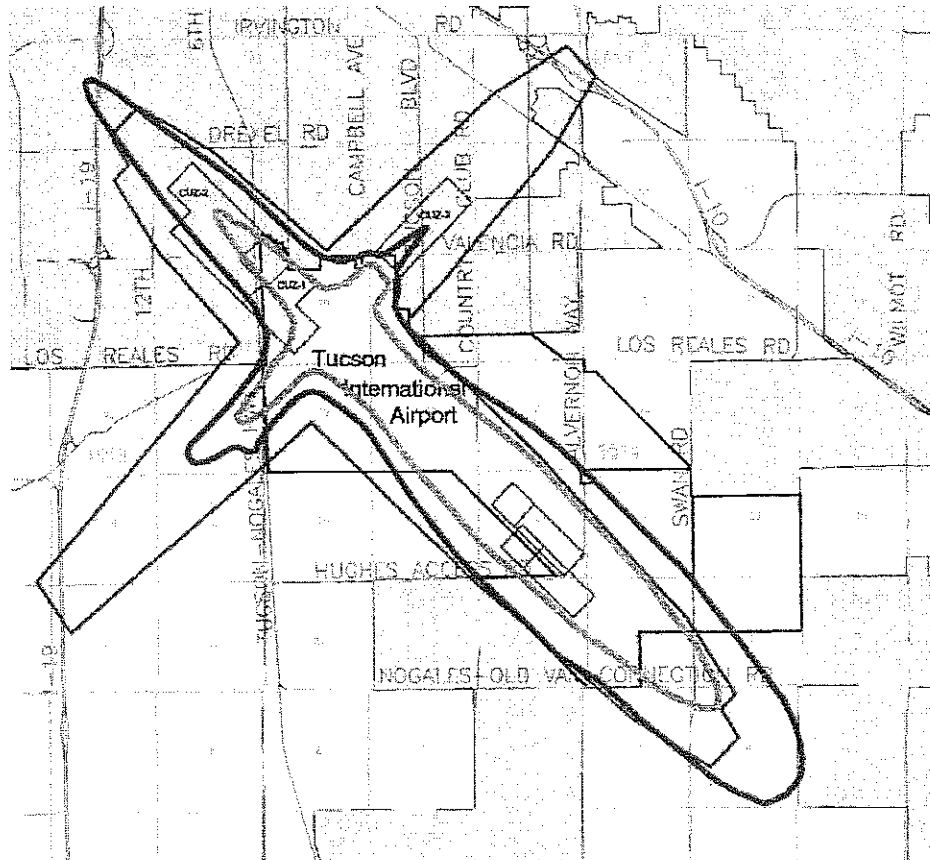
AMENDED JANUARY 26, 1991, BY ORDINANCE NO. 7557

AMENDED APRIL 27, 1992, BY ORDINANCE NO. 7805

AMENDED OCTOBER 28, 2002, BY ORDINANCE NO. 9781

AMENDED OCTOBER 25, 2004, BY ORDINANCE NO. 10073

CITY OF TUCSON LAND USE CODE
ARTICLE II. ZONES
DIVISION 8. OVERLAY ZONES
AIRPORT ENVIRONS ZONE (AEZ)



TIA Airport
Environs Zone

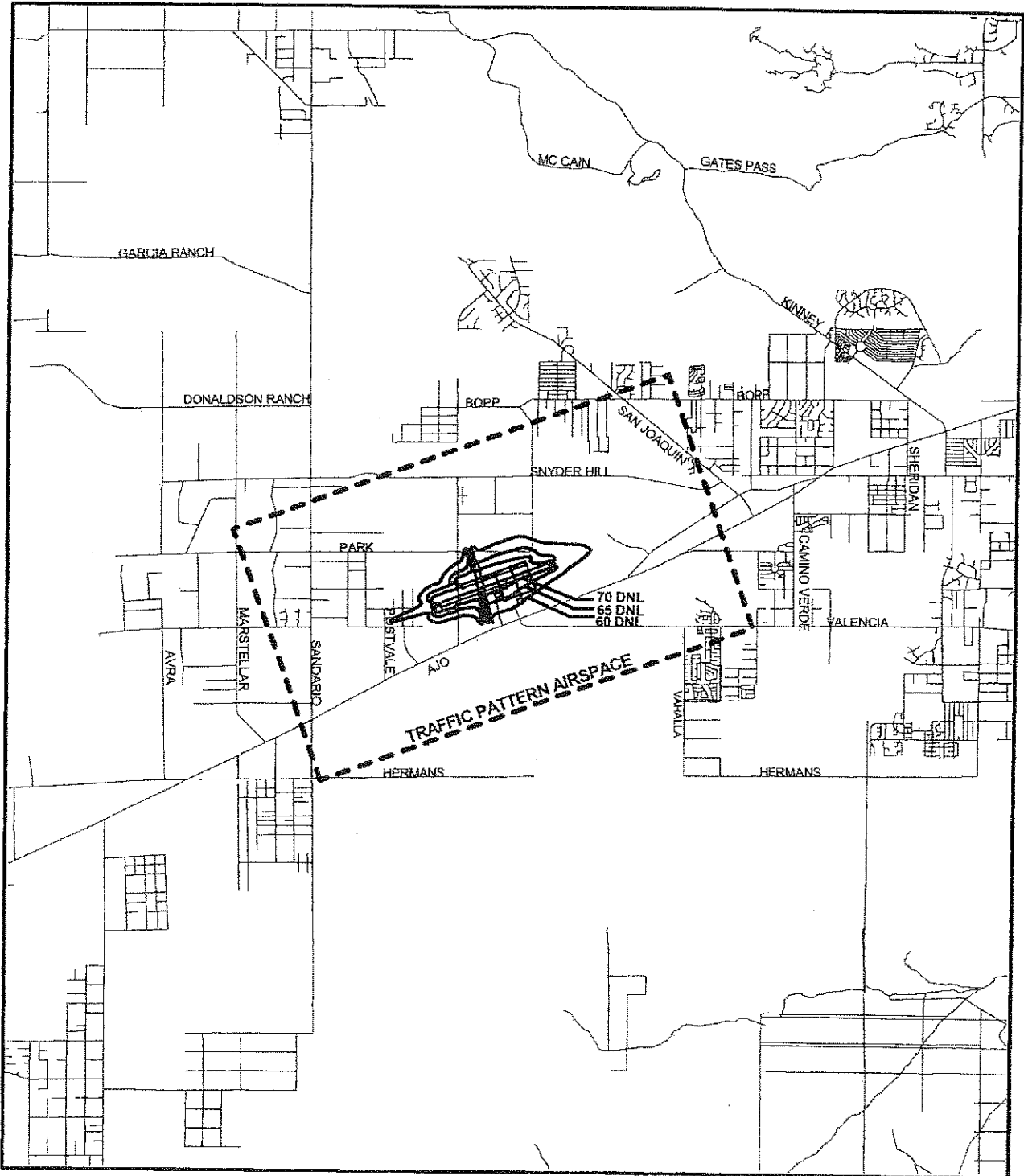
- Legend
- TIA Boundary
 - Airport Hazard District (AHD)
 - 65 Noise Contour (NCD-65)
 - 70 Noise Contour (NCD-70)
 - Compatibility Use Zones (CUZ)
 - City of Tucson



Map 2.8.5.2-II TIA Base Map

(Ord. No. 10073, §1, 10/25/04)

Ryan Airfield Public Airport Disclosure Map



*DNL = DAY / NIGHT AVERAGE SOUND LEVEL



1 0 1 2 Miles

1/05

HUD NOISE ASSESSMENT
TRAFFIC VOLUME PREDICTIONS

AUTOMOBILES AND TRUCKS (UNDER 10,000 POUNDS)

STREET	YEARS										
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
E Broadway Blvd	16225	16550	17377	18246	19158	20116	21122	22178	23287	24451	25674
S. Stone Ave.	9140	9323	9789	10278	10792	11332	11899	12493	13118	13774	14463
E. Congress St.	12747	13002	13652	14335	15051	15804	16594	17424	18295	19210	20170
S. 6th Ave	6634	6767	7105	7460	7833	8225	8636	9068	9521	9997	10497

MEDIUM TRUCKS (BETWEEN 10,000 AND 26,000 POUNDS)

STREET	YEARS										
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
E Broadway Blvd	811	827	869	912	958	1006	1056	1109	1164	1223	1284
S. Stone Ave.	457	466	489	514	540	567	595	625	656	689	723
E. Congress St.	637	650	683	717	753	790	830	871	915	960	1009
S. 6th Ave	332	338	355	373	392	411	432	453	476	500	525

HEAVY TRUCKS (OVER 26,000 POUNDS AND 3 AXLES)

STREET	YEARS										
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
E Broadway Blvd	162	165	174	182	192	201	211	222	233	245	257
S. Stone Ave.	91	93	98	103	108	113	119	125	131	138	145
E. Congress St.	127	130	137	143	151	158	166	174	183	192	202
S. 6th Ave	66	68	71	75	78	82	86	91	95	100	105

U. S. DOT CROSSING INVENTORY FORM

DEPARTMENT OF TRANSPORTATION
FEDERAL RAILROAD ADMINISTRATION

OMB No. 2130-001

Instructions for the initial reporting of the following types of new or previously unreported crossings: For public highway-rail grade crossings, complete the entire inventory Form. For private highway-rail grade crossings, complete the Header, Parts I and II, and the Submission Information section. For public pathway grade crossings (including pedestrian station grade crossings), complete the Header, Parts I and II, and the Submission Information section. For private pathway grade crossings, complete the Header, Parts I and II, and the Submission Information section. For grade-separated highway-rail or pathway crossings (including pedestrian station crossings), complete the Header, Part I, and the Submission Information section. For changes to existing data, complete the Header, Part I Items 1-3, and the Submission Information section, in addition to updated data fields. Note: For private crossings only, Part I Item 20 and Part III Item 2.K. are required unless otherwise noted. An asterisk * denotes an optional field.

A. Revision Date (MM/DD/YYYY) 03 / 06 / 2016	B. Reporting Agency <input checked="" type="checkbox"/> Railroad <input type="checkbox"/> Transit <input type="checkbox"/> State <input type="checkbox"/> Other	C. Reason for Update (Select only one) <input checked="" type="checkbox"/> Change in Data <input type="checkbox"/> New Crossing <input type="checkbox"/> Closed <input type="checkbox"/> Re-Open <input type="checkbox"/> Date Change Only <input type="checkbox"/> Change in Primary Operating RR	D. DOT Crossing Inventory Number 741124N
---	--	---	--

Part I: Location and Classification Information

1. Primary Operating Railroad Union Pacific Railroad Company [UP]		2. State ARIZONA		3. County PIMA	
4. City / Municipality <input checked="" type="checkbox"/> In <input type="checkbox"/> Near TUCSON		5. Street/Road Name & Block Number 7 TH AVENUE (Street/Road Name) * (Block Number)		6. Highway Type & No. CITY	
7. Do Other Railroads Operate a Separate Track at Crossing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Specify RR			8. Do Other Railroads Operate Over Your Track at Crossing? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Specify RR ATK		
9. Railroad Division or Region <input type="checkbox"/> None SUNSET		10. Railroad Subdivision or District <input type="checkbox"/> None Gila		11. Branch or Line Name <input checked="" type="checkbox"/> None	
12. RR Milepost 0983.600 (prefix) (nnnn.nnn) (suffix)		13. Line Segment *			
14. Nearest RR Timetable Station *		15. Parent RR (if applicable) <input checked="" type="checkbox"/> N/A		16. Crossing Owner (if applicable) <input checked="" type="checkbox"/> N/A	
17. Crossing Type <input checked="" type="checkbox"/> Public <input type="checkbox"/> Private	18. Crossing Purpose <input checked="" type="checkbox"/> Highway <input type="checkbox"/> Pathway, Ped. <input type="checkbox"/> Station, Ped.	19. Crossing Position <input checked="" type="checkbox"/> At Grade <input type="checkbox"/> RR Under <input type="checkbox"/> RR Over	20. Public Access (if Private Crossing) <input type="checkbox"/> Yes <input type="checkbox"/> No	21. Type of Train <input checked="" type="checkbox"/> Freight <input type="checkbox"/> Intercity Passenger <input type="checkbox"/> Commuter <input type="checkbox"/> Transit <input type="checkbox"/> Shared Use Transit <input type="checkbox"/> Tourist/Other	22. Average Passenger Train Count Per Day <input checked="" type="checkbox"/> Less Than One Per Day <input type="checkbox"/> Number Per Day
23. Type of Land Use <input type="checkbox"/> Open Space <input type="checkbox"/> Farm <input type="checkbox"/> Residential <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Institutional <input type="checkbox"/> Recreational <input type="checkbox"/> RR Yard					
24. Is there an Adjacent Crossing with a Separate Number? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Provide Crossing Number			25. Quiet Zone (FRA provided) <input checked="" type="checkbox"/> No <input type="checkbox"/> 24 Hr <input type="checkbox"/> Partial <input type="checkbox"/> Chicago Excused Date Established		
26. HSR Corridor ID <input checked="" type="checkbox"/> N/A	27. Latitude in decimal degrees (WGS84 std: nn.nnnnnn) 32.2263821		28. Longitude in decimal degrees (WGS84 std: -nnn.nnnnnn) -110.9702125		29. Lat/Long Source <input checked="" type="checkbox"/> Actual <input type="checkbox"/> Estimated
30.A. Railroad Use *			31.A. State Use * ENS ON BUNGALOW		
30.B. Railroad Use *			31.B. State Use *		
30.C. Railroad Use *			31.C. State Use *		
30.D. Railroad Use *			31.D. State Use *		
32.A. Narrative (Railroad Use) *			32.B. Narrative (State Use) *		
33. Emergency Notification Telephone No. (posted) 800-848-8715		34. Railroad Contact (Telephone No.) 402-544-3721		35. State Contact (Telephone No.) 602-712-6193	

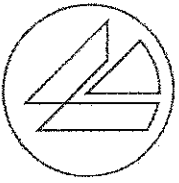
Part II: Railroad Information

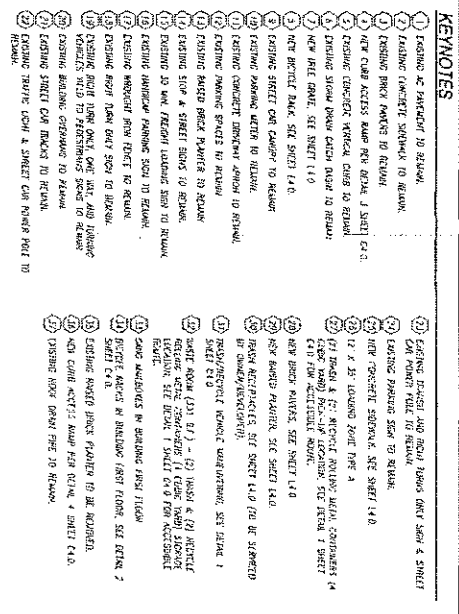
1. Estimated Number of Daily Train Movements				
1.A. Total Day Thru Trains (6 AM to 6 PM) 20	1.B. Total Night Thru Trains (6 PM to 6 AM) 20	1.C. Total Switching Trains 2	1.D. Total Transit Trains 0	1.E. Check if Less Than One Movement Per Day How many trains per week? <input type="checkbox"/>
2. Year of Train Count Data (YYYY) 2016		3. Speed of Train at Crossing 3.A. Maximum Timetable Speed (mph) 40 3.B. Typical Speed Range Over Crossing (mph) From 20 to 40		
4. Type and Count of Tracks Main 1 Siding 0 Yard 0 Transit 0 Industry 0				
5. Train Detection (Main Track only) <input type="checkbox"/> Constant Warning Time <input type="checkbox"/> Motion Detection <input type="checkbox"/> AFO <input type="checkbox"/> PTC <input type="checkbox"/> DC <input checked="" type="checkbox"/> Other <input type="checkbox"/> None				
6. Is Track Signaled? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		7.A. Event Recorder <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		7.B. Remote Health Monitoring <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

U. S. DOT CROSSING INVENTORY FORM

A. Revision Date (MM/DD/YYYY) 03/06/2016		PAGE 2		D. Crossing Inventory Number (7 char.) 741124N	
Part III: Highway or Pathway Traffic Control Device Information					
1. Are there Signs or Signals? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		2. Types of Passive Traffic Control Devices associated with the Crossing			
		2.A. Crossbuck Assemblies (count) 1	2.B. STOP Signs (R1-1) (count) 1	2.C. YIELD Signs (R1-2) (count)	2.D. Advance Warning Signs (Check all that apply; include count) <input type="checkbox"/> Non <input checked="" type="checkbox"/> W10-1 <input type="checkbox"/> W10-3 <input type="checkbox"/> W10-11 <input type="checkbox"/> W10-2 <input type="checkbox"/> W10-4 <input type="checkbox"/> W10-12
2.E. Low Ground Clearance Sign (W10-5) <input type="checkbox"/> Yes (count 0) <input checked="" type="checkbox"/> No		2.F. Pavement Markings <input checked="" type="checkbox"/> Stop Lines <input type="checkbox"/> Dynamic Envelope <input checked="" type="checkbox"/> RR Xing Symbols <input type="checkbox"/> None		2.G. Channelization Devices/Medians <input checked="" type="checkbox"/> All Approaches <input checked="" type="checkbox"/> Median <input type="checkbox"/> One Approach <input type="checkbox"/> None	
2.H. EXEMPT Sign (R15-3) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2.I. ENS Sign (I-13) Displayed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
2.J. Other MUTCD Signs Specify Type _____ Count 2 Specify Type _____ Count 1 Specify Type _____ Count _____		2.K. Private Crossing Signs (if private) <input type="checkbox"/> Yes <input type="checkbox"/> No		2.L. LED Enhanced Signs (List types)	
3. Types of Train Activated Warning Devices at the Grade Crossing (specify count of each device for all that apply)					
3.A. Gate Arms (count) Roadway 2 Pedestrian _____	3.B. Gate Configuration <input type="checkbox"/> 2 Quad <input type="checkbox"/> Full (Barrier) <input type="checkbox"/> 3 Quad Resistance <input type="checkbox"/> 4 Quad <input type="checkbox"/> Median Gates	3.C. Cantilevered (or Bridged) Flashing Light Structures (count) Over Traffic Lane 0 <input type="checkbox"/> Incandescent Not Over Traffic Lane 0 <input type="checkbox"/> LED		3.D. Mast Mounted Flashing Lights (count of masts) 0 <input type="checkbox"/> Incandescent <input type="checkbox"/> LED <input type="checkbox"/> Back Lights Included <input type="checkbox"/> Side Lights Included	3.E. Total Count of Flashing Light Pairs 5
3.F. Installation Date of Current Active Warning Devices: (MM/YYYY) ____/____/____ <input checked="" type="checkbox"/> Not Required		3.G. Wayside Horn <input type="checkbox"/> Yes Installed on (MM/YYYY) ____/____/____ <input type="checkbox"/> No		3.H. Highway Traffic Signals Controlling Crossing <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3.I. Bells (count) 2				3.J. Non-Train Active Warning <input type="checkbox"/> Flagging/Flagman <input type="checkbox"/> Manually Operated Signals <input type="checkbox"/> Watchman <input type="checkbox"/> Floodlighting <input type="checkbox"/> None	
3.K. Other Flashing Lights or Warning Devices Count 1 Specify type SIDE					
4.A. Does nearby Hwy Intersection have Traffic Signals? <input type="checkbox"/> Yes <input type="checkbox"/> No	4.B. Hwy Traffic Signal Interconnection <input type="checkbox"/> Not Interconnected <input type="checkbox"/> For Traffic Signals <input type="checkbox"/> For Warning Signs	4.C. Hwy Traffic Signal Preemption <input type="checkbox"/> Simultaneous <input type="checkbox"/> Advance	5. Highway Traffic Pre-Signals <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Storage Distance * _____ Stop Line Distance * _____	6. Highway Monitoring Devices (Check all that apply) <input type="checkbox"/> Yes - Photo/Video Recording <input type="checkbox"/> Yes - Vehicle Presence Detection <input type="checkbox"/> None	
Part IV: Physical Characteristics					
1. Traffic Lanes Crossing Railroad Number of Lanes 2 <input type="checkbox"/> One-way Traffic <input type="checkbox"/> Two-way Traffic <input type="checkbox"/> Divided Traffic		2. Is Roadway/Pathway Paved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		3. Does Track Run Down a Street? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
4. Is Crossing Illuminated? (Street lights within approx. 50 feet from nearest rail) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
5. Crossing Surface (on Main Track, multiple types allowed) Installation Date * (MM/YYYY) ____/____/____ Width * _____ Length * _____ <input type="checkbox"/> 1 Timber <input type="checkbox"/> 2 Asphalt <input type="checkbox"/> 3 Asphalt and Timber <input checked="" type="checkbox"/> 4 Concrete <input type="checkbox"/> 5 Concrete and Rubber <input type="checkbox"/> 6 Rubber <input type="checkbox"/> 7 Metal <input type="checkbox"/> 8 Unconsolidated <input type="checkbox"/> 9 Composite <input type="checkbox"/> 10 Other (specify) _____					
6. Intersecting Roadway within 500 feet? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Approximate Distance (feet) 75		7. Smallest Crossing Angle <input type="checkbox"/> 0° - 29° <input type="checkbox"/> 30° - 59° <input checked="" type="checkbox"/> 60° - 90°		8. Is Commercial Power Available? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Part V: Public Highway Information					
1. Highway System <input type="checkbox"/> (01) Interstate Highway System <input type="checkbox"/> (02) Other Nat Hwy System (NHS) <input type="checkbox"/> (03) Federal AID, Not NHS <input checked="" type="checkbox"/> (08) Non-Federal Aid		2. Functional Classification of Road at Crossing <input type="checkbox"/> (0) Rural <input checked="" type="checkbox"/> (1) Urban <input type="checkbox"/> (1) Interstate <input type="checkbox"/> (5) Major Collector <input type="checkbox"/> (2) Other Freeways and Expressways <input type="checkbox"/> (3) Other Principal Arterial <input type="checkbox"/> (6) Minor Collector <input type="checkbox"/> (4) Minor Arterial <input checked="" type="checkbox"/> (7) Local		3. Is Crossing on State Highway System? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
4. Highway Speed Limit 25 MPH <input checked="" type="checkbox"/> Posted <input type="checkbox"/> Statutor		5. Linear Referencing System (LRS Route ID) *			
6. LRS Milepost *					
7. Annual Average Daily Traffic (AADT) Year 2010 AADT 499		8. Estimated Percent Trucks 40 %		9. Regularly Used by School Buses? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Average Number per Day 0	
10. Emergency Services Route <input type="checkbox"/> Yes <input type="checkbox"/> No					
Submission Information - This information is used for administrative purposes and is not available on the public website.					
Submitted by _____ Organization _____ Phone _____ Date _____					
Public reporting burden for this information collection is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. According to the Paperwork Reduction Act of 1995, a federal agency may not conduct or sponsor, and a person is not required to, nor shall a person be subject to a penalty for failure to comply with, a collection of information unless it displays a currently valid OMB control number. The valid OMB control number for information collection is 2130-0017. Send comments regarding this burden estimate or any other aspect of this collection, including for reducing this burden to: Information Collection Officer, Federal Railroad Administration, 1200 New Jersey Ave. SE, MS-25 Washington, DC 20590.					

APPENDIX D



[illegible]

DP15-0208
CO. HONORIFIANTIVE ADDRESS
10 E. BROADWAY
TUCSON, AZ 85701

REF NO'S 11D-1410, T15S-000035

1	NAME	GAERNER
2	ADDRESS	
3	CITY	
4	STATE	
5	ZIP	

RECEIVED
FBI - TUCSON
JUN 10 1994
HONORARY
MEMBER
OF THE
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE



BOOK 3 PAGE 70 M.&P.



4.30 Acres ~ 16.375 S.F. Parcel is zoned R-2 AND OCH-2

- Any plant material in waste requiring landscaping that does not survive will be replaced with an equivalent size and species within 30 days.
- Landscape maintenance will be provided including watering, pruning, mulching, weeding, and fertilizing. Per the Unified Development Code, all required landscaping, irrigation, and the replacement will be maintained. The property owner is responsible for proper and adequate landscaping as required by the UDC.

It is the owners responsibility to keep the Site Velocity things as (SST) and the pad position correct. And a change of installation at all times, our United Development Code 1992 section.

- ## LANDSCAPE NOTES

As Brawitt mix the finished planter boxes and all inside plants sufficient bedding that consists of 50% screened loam and 50% GFCO-VELL Brand Organic Compost. Insert it into inner layer with filter fabric as drainage layer in raised planter boxes.

PLANT	BOTANICAL NAME
...	...

INERT MATERIALS

DG Decomposed Granite -
1/2" Material - 2" Depth
Color - "Apache Brown"

RM Rock Mulch 1"-3"
Fractured Rock 3"

—

GREENER

Address:	_____		State:	_____
Expensing:	_____		Year:	_____
My car:	_____	Model:	_____	
Price:	_____	Year:	_____	
Lease:	_____	Year:	_____	
License:	_____	Date:	_____	
Insured:	_____	Year:	_____	

L2.0

10

2025 3 PAGE 70 450

IRRIGATION LEGEND

1	Water Meter	Station P O.C.
2	Manhole	X-Cut Outdoor Manhole
3	Falcoo	W.M. ROOF
4		34" Redwood Pressure Backfill
5		Provision, P-200 300, 120
6	Rain Bird	Superlock with 600's
7		X-Cut P-100, 1" Low Bow Contrast
8		Zone 10

34" Steel	40 POC
2" Steel	40 POC
1" Steel	40 POC
3/4" Steel	40 POC
1/2" Steel	40 POC
1/4" Steel	40 POC
1/8" Steel	40 POC
1/16" Steel	40 POC
1/32" Steel	40 POC
1/64" Steel	40 POC
1/128" Steel	40 POC
1/256" Steel	40 POC
1/512" Steel	40 POC
1/1024" Steel	40 POC
1/2048" Steel	40 POC
1/4096" Steel	40 POC
1/8192" Steel	40 POC
1/16384" Steel	40 POC
1/32768" Steel	40 POC
1/65536" Steel	40 POC
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IRRIGATION NOTES

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JACKSON STREET

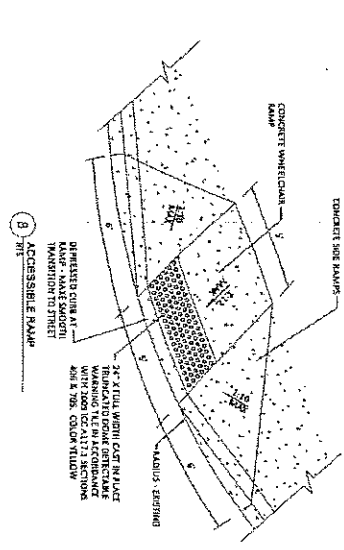
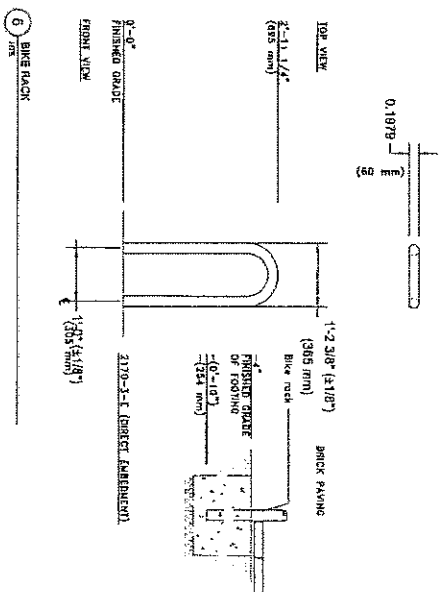
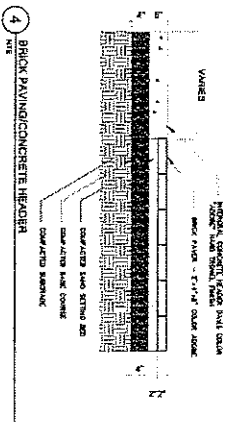
JOHN NUCIO • LANDSCAPE ARCHITECT, LLC
5136 N. STONEHOUSE PL.
TUCSON, ARIZONA 85750
P: (520) 400-5523
E: jnucio@jennucio.com
PROJECT NO: 15-31

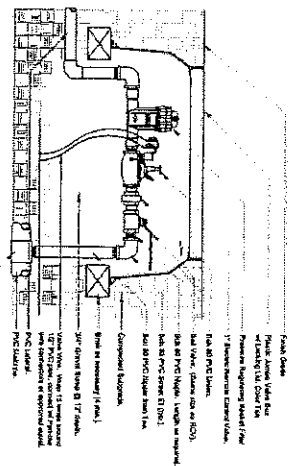
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1-800-722-5340		1-800-722-5340	

[illegible]

DP15-0208
DOT ADMINISTRATIVE ADDRESS
10 E. BROADWAY
TUCSON, AZ 85701
REF NO: DP-15-09, T19A00015

[illegible]



1. Remote Control Valve with Filter - ORP

2. Mainline

3. Lateral

4. Emitters

5. Backflow Preventer

6. Pressure Gauge

7. Air Release Valve

8. Check Valve

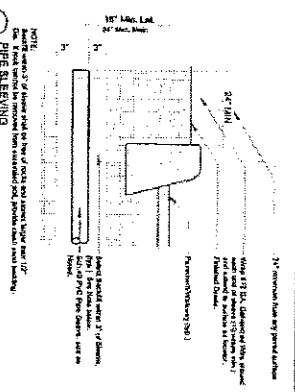
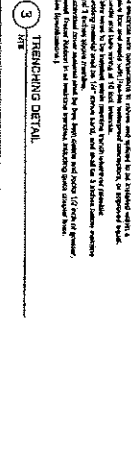
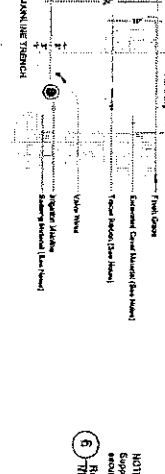
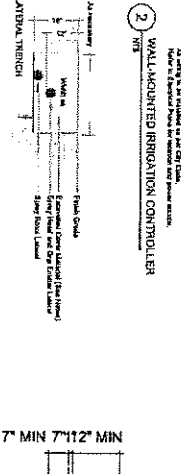
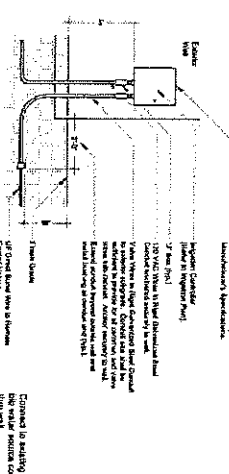
9. Shut-off Valve

10. Manhole

11. Elevation

12. Stationing

13. Notes



4. Pipe Bedding

5. Backflow Preventer

6. Pressure Gauge

7. Air Release Valve

8. Check Valve

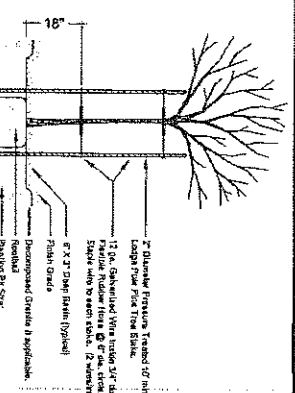
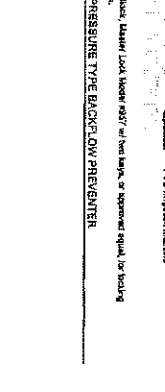
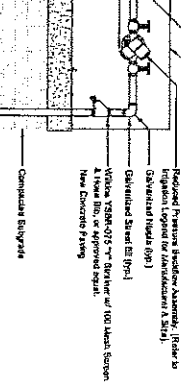
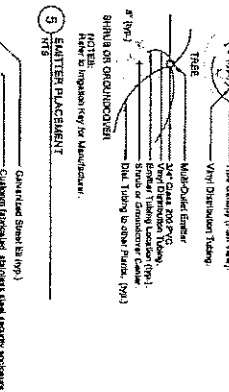
9. Shut-off Valve

10. Manhole

11. Elevation

12. Stationing

13. Notes



7. Single Trunk Tree Planting

8. Backflow Preventer

9. Pressure Gauge

10. Air Release Valve

11. Check Valve

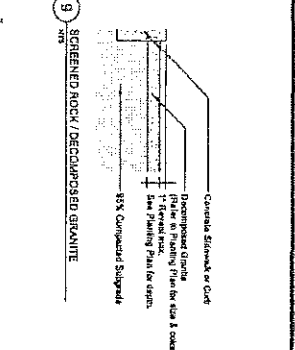
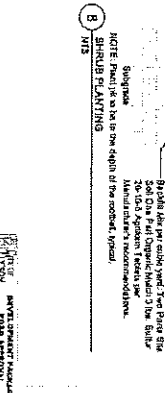
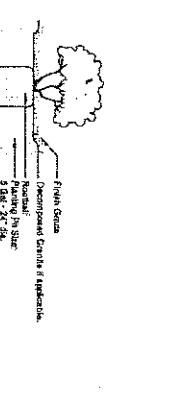
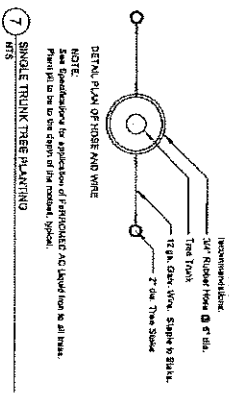
12. Shut-off Valve

13. Manhole

14. Elevation

15. Stationing

16. Notes



9. Screened Rock/Decomposed Granite

10. Backflow Preventer

11. Pressure Gauge

12. Air Release Valve

13. Check Valve

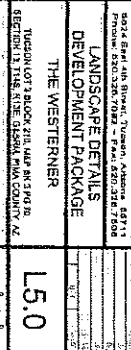
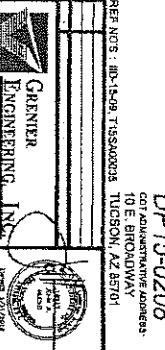
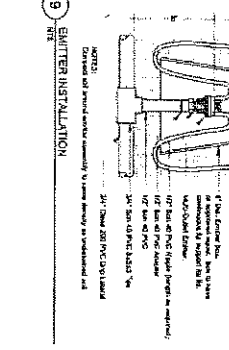
14. Shut-off Valve

15. Manhole

16. Elevation

17. Stationing

18. Notes



JOHN HENZ LANDSCAPE ARCHITECT, LLC
5028 N. STURGEON RD.
TUCSON, ARIZONA 85705
P: (520) 450-4559
F: (520) 450-4559
H: (520) 450-4559

100 STAGE OR
100-70-000

LANDSCAPE ARCHITECT
TUCSON, ARIZONA 85705

LANDSCAPE DETAILS
DEVELOPMENT PACKAGE
THE WESTERNER

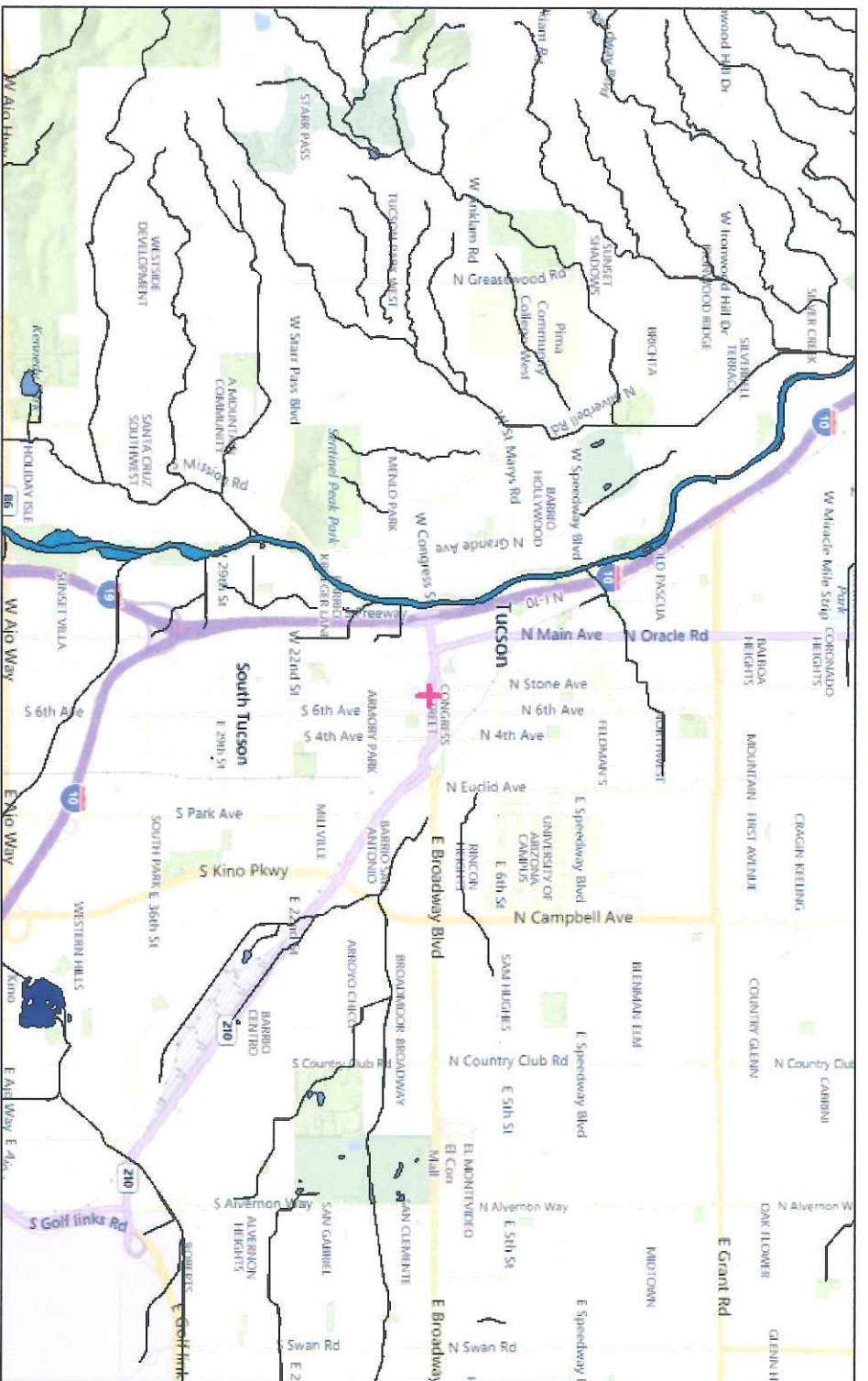
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DP15-0208
COT ADMINISTRATIVE ADDRESS
10 E. BROADWAY
TUCSON, AZ 85701

GENIER
ENGINEERING, INC.
5024 E. 4TH AVENUE, TUCSON, ARIZONA 85711
PHONE: (520) 326-7000 FAX: (520) 326-7000

LANDSCAPE ARCHITECT
TUCSON, ARIZONA 85705

West Point Apartments NWI Wetlands 8-22-16



August 22, 2016

+ Search Result (point)

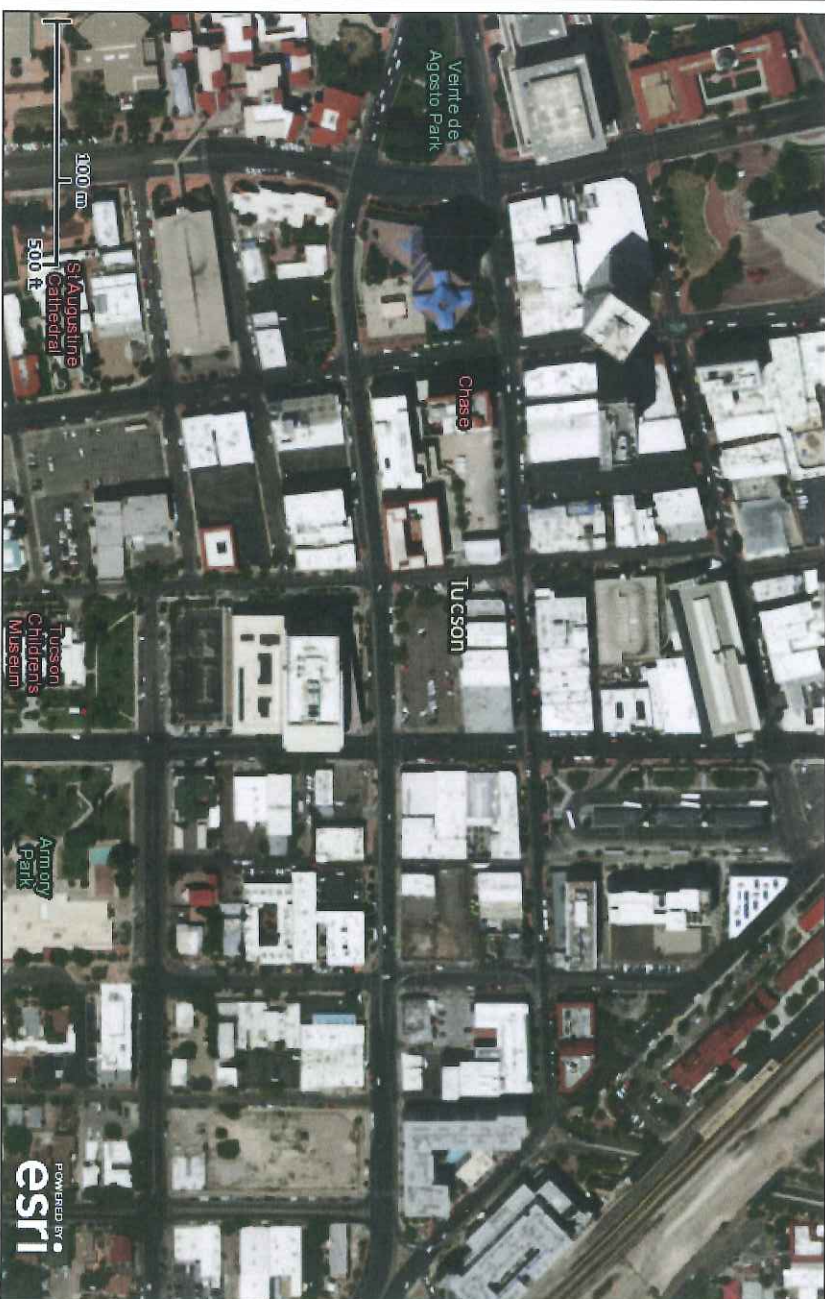
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0 0.5 1 2 4
0 1 2 4
U.S. Fish and Wildlife Service, National Standards and Support Team.
wetlands_team@fws.gov



U.S. Fish and Wildlife Service
National Wetlands Inventory

West Pont
Apartments

Aug 19, 2016

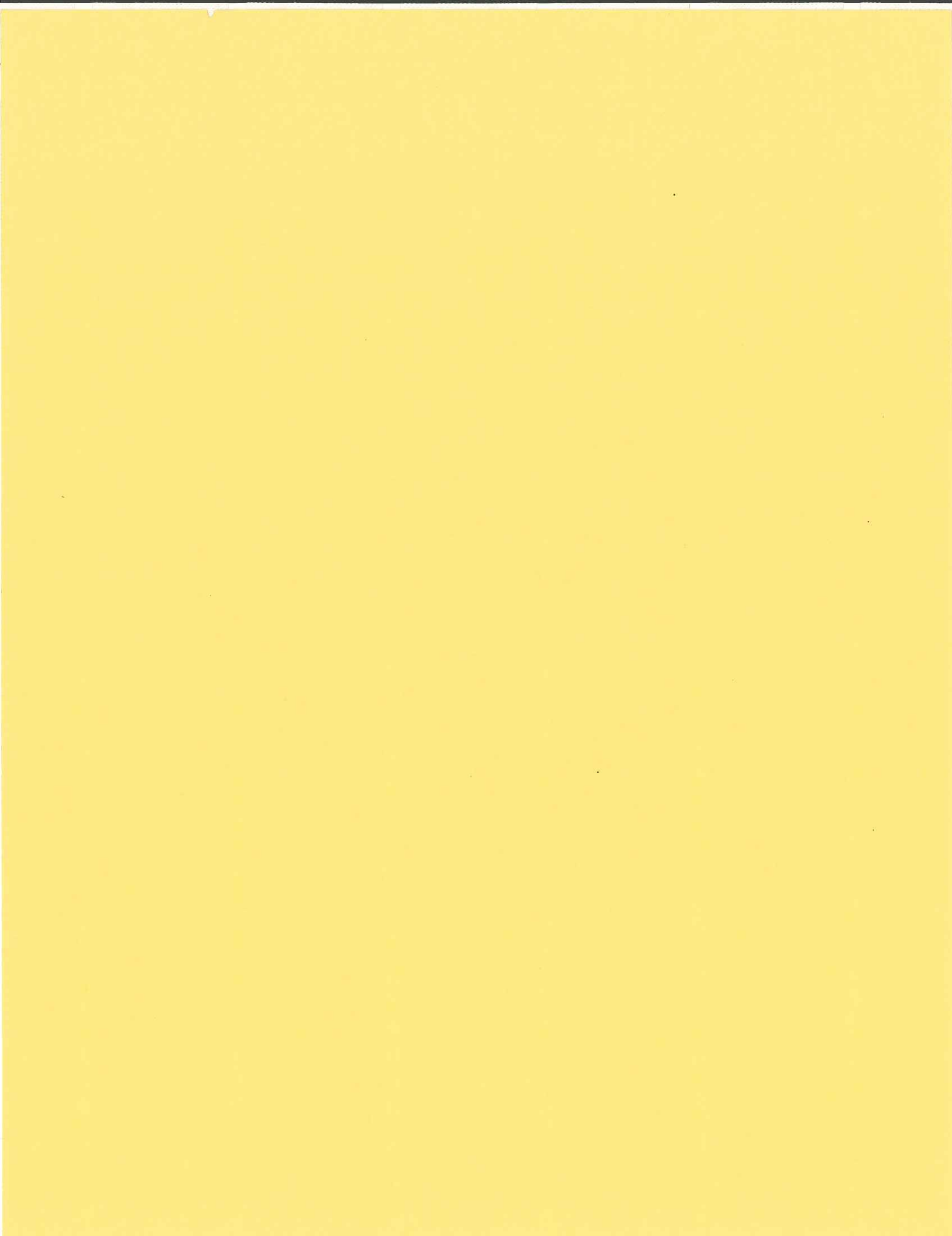


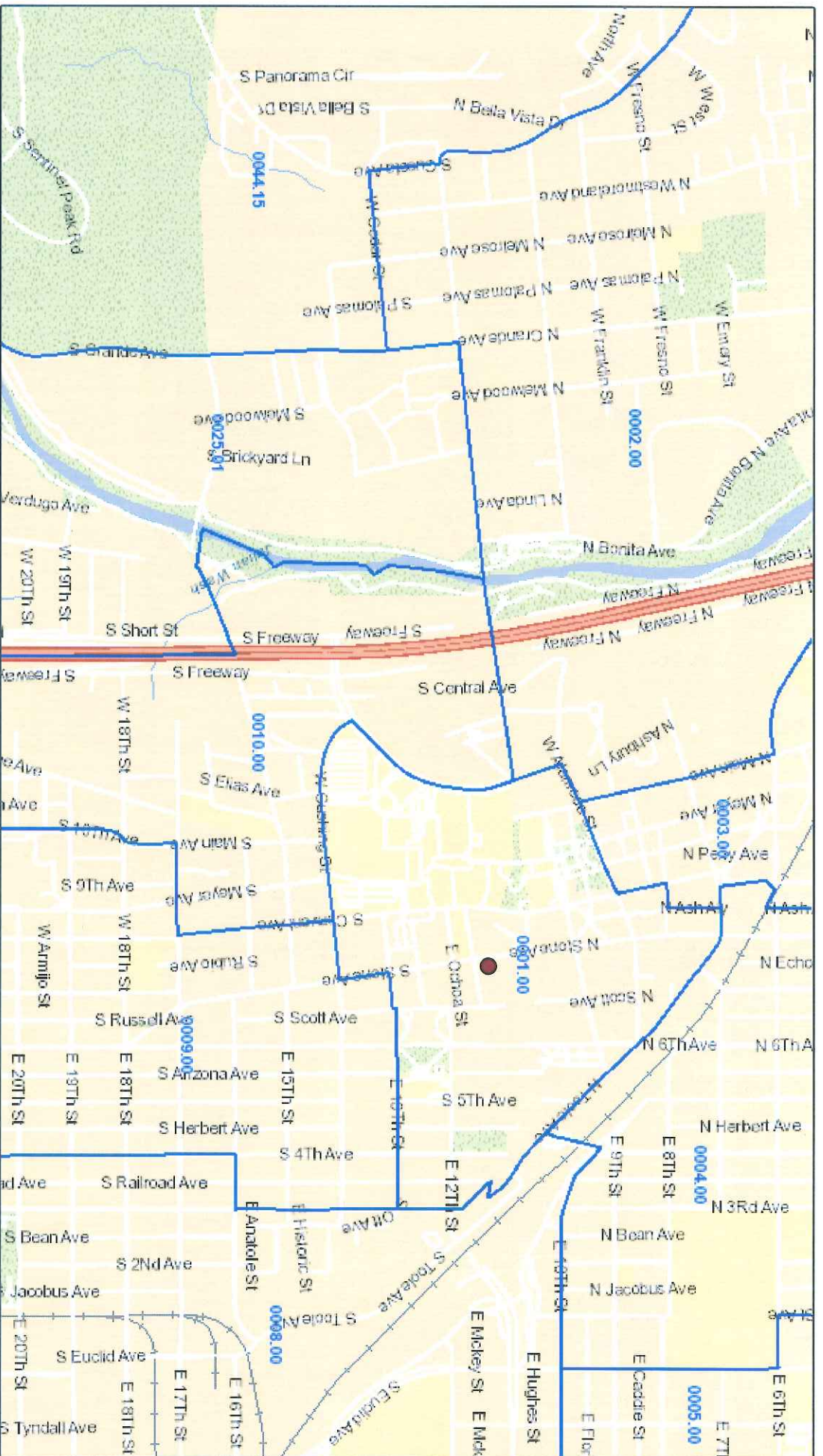
Wetlands

- Freshwater Emergent
 - Freshwater Forested/Shrub
 - Estuarine and Marine Deepwater
 - Estuarine and Marine
 - Freshwater Pond
 - Lake
 - Riverine
 - Other
- Riparian
- Herbaceous
 - Forested/Shrub
- Riparian Status
- Digital Data

User Remarks:
8/19/16

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.





● Matched Address: 10 E BROADWAY BLVD, TUCSON, AZ, 85701
MSA: 46060 - TUCSON, AZ || State: 04 - ARIZONA || County: 019 - PIMA COUNTY || Tract Code: 0001.00

Selected Tract
MSA: || State: || County: || Tract Code:

2015 FFIEC Geocode Census Report

Matched Address: 10 E BROADWAY BLVD, TUCSON, AZ, 85701
 MSA: 46060 - TUCSON, AZ
 State: 04 - ARIZONA
 County: 019 - PIMA COUNTY
 Tract Code: 0001.00

Summary Census Demographic Information

Tract Income Level	Low
Underserved or Distressed Tract	No
2015 FFIEC Estimated MSAMD/non-MSAMD Median Family Income	\$59,000
2015 Estimated Tract Median Family Income	\$8,626
2010 Tract Median Family Income	\$8,393
Tract Median Family Income %	14.62
Tract Population	514
Tract Minority %	34.63
Tract Minority Population	178
Owner-Occupied Units	14
1 - to 4 - Family Units	139

Census Income Information

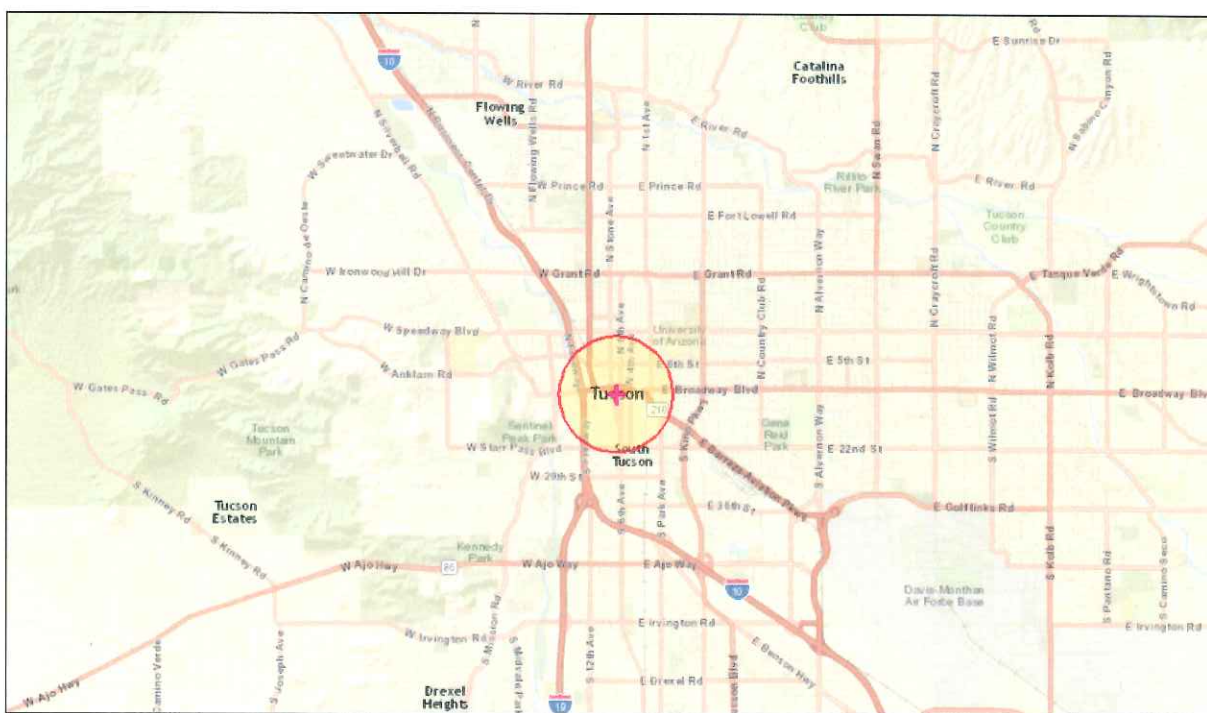
Tract Income Level	Low
2010 MSAMD/statewide non-MSAMD Median Family Income	\$57,377
2015 FFIEC Estimated MSAMD/non-MSAMD Median Family Income	\$59,000
% below Poverty Line	57.18
Tract Median Family Income %	14.62
2010 Tract Median Family Income	\$8,393
2015 Estimated Tract Median Family Income	\$8,626
2010 Tract Median Household Income	\$9,832

Census Population Information

Tract Population	514
Tract Minority %	34.63
Number of Families	44
Number of Households	259
Non-Hispanic White Population	336
Tract Minority Population	178
American Indian Population	4
Asian/Hawaiian/Pacific Islander Population	10
Black Population	18
Hispanic Population	130
Other/Two or More Races Population	16

Census Housing Information

Total Housing Units	409
1 - to 4 - Family Units	139
Median House Age (Years)	54
Owner-Occupied Units	14
Renter Occupied Units	245
Owner Occupied 1 - to 4 - Family Units	14
Inside Principal City?	YES
Vacant Units	150



August 22, 2016

- Buffer Area
- + Digitized Point

0 1.25 2.5 5 mi
0 2 4 8 km
1:144,448
Sources: Esri, HERE, DeLorme, USGS, Imagery, Mapbox, Swatch, © OpenStreetMap contributors, and the GIS User Community

Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0
National Pollutant Discharge Elimination System (NPDES)	0

Selected Variables	Value	State Average	Percentile in State	EPA Region Average	Percentile in EPA Region	USA Average	Percentile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	7.22	7.62	37	9.37	16	9.32	11
Ozone (ppb)	50.8	54.8	7	51	46	47.4	67
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	1.81	1.11	83	0.978	80-90th	0.937	90-95th
NATA* Air Toxics Cancer Risk (risk per MM)	63	44	98	43	95-100th	40	95-100th
NATA* Respiratory Hazard Index	2.8	1.5	93	2	80-90th	1.8	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	5300	830	95	1100	94	590	97
Lead Paint Indicator (% pre-1960s housing)	0.54	0.091	95	0.24	80	0.3	78
Superfund Proximity (site count/km distance)	0.075	0.078	70	0.15	53	0.13	57
RMP Proximity (facility count/km distance)	0.2	0.39	60	0.57	48	0.43	56
Hazardous Waste Proximity (facility count/km distance)	0	0.064	30	0.11	19	0.072	26
Water Discharger Proximity (count/km)	0.12	0.19	50	0.2	48	0.31	37
Demographic Indicators							
Demographic Index	55%	41%	71	47%	62	36%	77
Minority Population	47%	43%	62	58%	38	37%	66
Low Income Population	60%	39%	78	36%	82	35%	85
Linguistically Isolated Population	7%	5%	76	9%	57	5%	78
Population with Less Than High School Education	15%	14%	62	17%	53	14%	63
Population under Age 5	2%	7%	17	7%	13	6%	14
Population over Age 64	7%	15%	35	13%	30	14%	22

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on

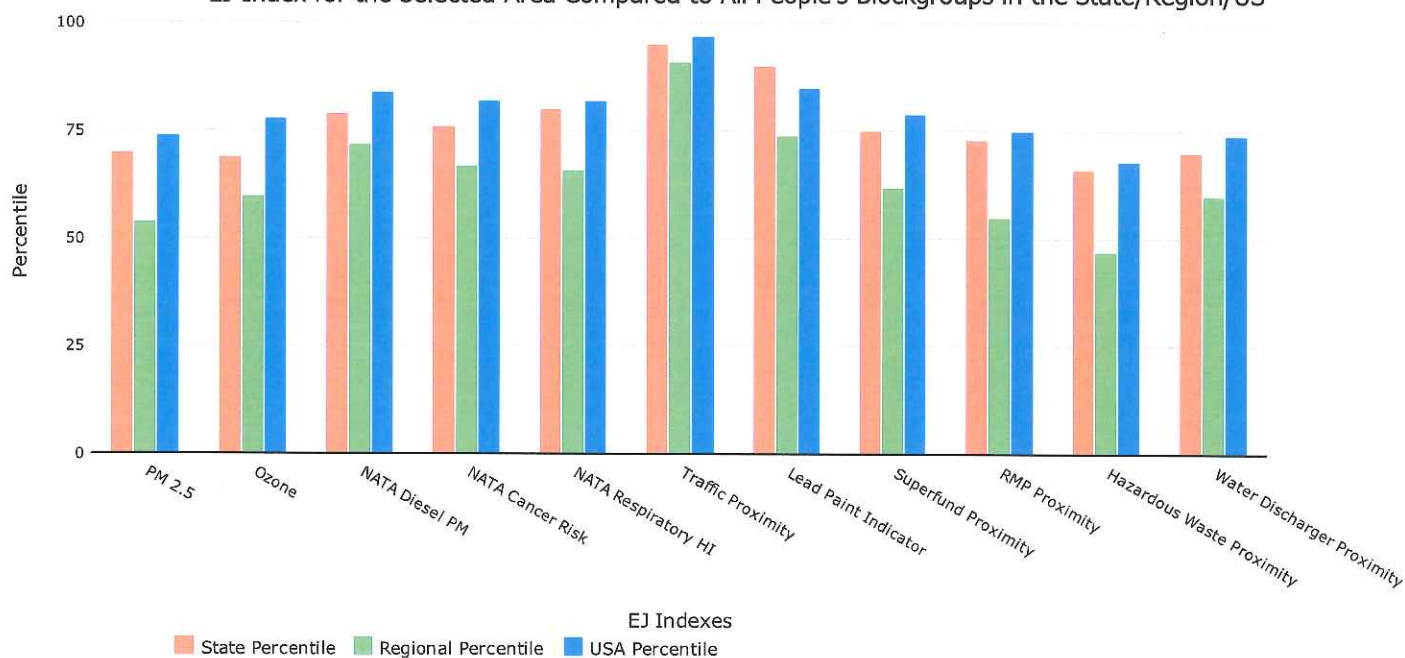


EJSCREEN Report (Version 2016)
1 mile Ring Centered at 32.220122,-110.969980
ARIZONA, EPA Region 9
Approximate Population: 12,850
Input Area (sq. miles): 3.14
 West Point Apartments 10 E. Broadway



Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	70	54	74
EJ Index for Ozone	69	60	78
EJ Index for NATA* Diesel PM	79	72	84
EJ Index for NATA* Air Toxics Cancer Risk	76	67	82
EJ Index for NATA* Respiratory Hazard Index	80	66	82
EJ Index for Traffic Proximity and Volume	95	91	97
EJ Index for Lead Paint Indicator	90	74	85
EJ Index for Superfund Proximity	75	62	79
EJ Index for RMP Proximity	73	55	75
EJ Index for Hazardous Waste Proximity	66	47	68
EJ Index for Water Discharger Proximity	70	60	74

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

WESTERNER 10 E. BROADWAY



Existing Building

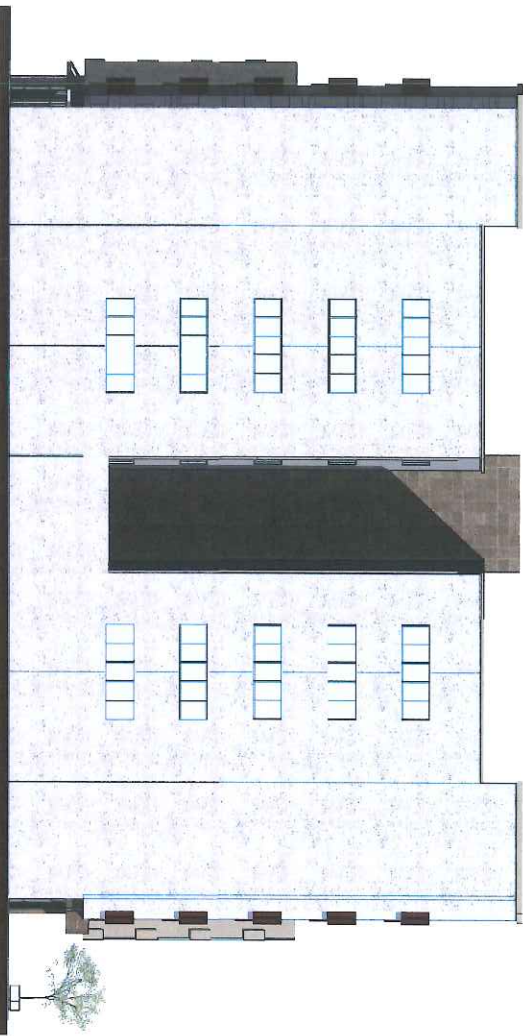


Historic Photos



Rendering Looking Northwest

WESTERNER 10 E. BROADWAY
Building Elevations



East Elevation



North Elevation



West Elevation



South Elevation



JONATHAN ROTHSCILD
MAYOR

CITY OF TUCSON
OFFICE OF THE MAYOR

255 WEST ALAMEDA
P.O. BOX 27210
TUCSON, ARIZONA 85726-7210
PHONE: (520) 791-4201
FAX: (520) 791-5348

February 26, 2016


Arizona Department of Housing
ATTN: Michael Traylor, Director
1110 W. Washington St. Suite 310
Phoenix, AZ 85007

Re: LIHTC Application
LaFrontera
Westerner Apartments

Dear Mr. Traylor:

The City of Tucson has developed an inter-departmental review team to evaluate proposed projects within the City and to assist developers in obtaining needed information and support. As such we are providing a standardized support letter and documentation to ensure consistency and completeness. This letter culminates and is endorsed by the appropriate local government officials with details outlined and executed below.

City of Tucson Planning and Development Services Department (PDSD)
Staff from the City of Tucson Planning and Development Services Department has reviewed the site plan and determined that the Project has achieved final site plan approval. A copy of the Arizona Department of Housing LIHTC Form 9 – Local Government Site Plan Approval is attached as Attachment #1. Also, PDSD staff has reviewed project as proposed and confirmed that the current zoning status of OCR-2 permits construction of the project as proposed. A copy of the Arizona Department of Housing LIHTC Form 10 – Planning and Zoning Verification is attached as Attachment #2.


Nicole Ewing-Gavin, Interim Director - PDSD

City of Tucson Office of Historic Preservation

I have reviewed the current plans for this proposed LIHTC project that include rehabilitation of the 1949 Westerner Hotel building, eligible for listing in the National Register of Historic Places as a contributing property in the eligible Downtown Tucson Historic District. This project also includes construction of a new six-story apartment building adjacent to the four-story hotel. There is no possibility of any archaeological remains being present because the site has been fully developed previously. Based my review of the plans, and in concurrence with the Arizona State Historic

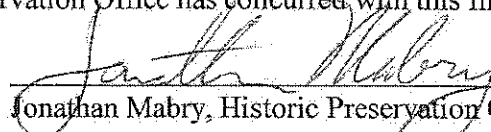


JONATHAN ROTHSCHILD
MAYOR

CITY OF TUCSON
OFFICE OF THE MAYOR

255 WEST ALAMEDA
P.O. BOX 27210
TUCSON, ARIZONA 85726-7210
PHONE: (520) 791-4201
FAX: (520) 791-5348

Preservation Office and the Plans Review Subcommittee of the Tucson-Pima County Historical Commission, it is my finding that this project will not have an adverse effect on any historic properties. The Arizona State Historic Preservation Office has concurred with this finding as evidenced in Attachment #3.


Jonathan Mabry, Historic Preservation Officer

City of Tucson – Water Department

Attached as Attachment #4 is a "will serve" letter from the Tucson Water Department confirming water supply and service for the West End Station project. Sewer service is provided by Pima County Wastewater Reclamation Department (RWRD) but billed through by the City of Tucson through an Inter-Governmental Agreement. Attached as Attachment #5 is a "will serve" letter confirming RWRD will provide conveyance and treatment service to this project.


Timothy Thomure, Director Tucson Water

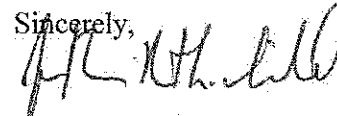
City of Tucson – Transportation Department

Attached as Attachment #6 is confirmation that there are currently no plans to change, alter, or move bus routes or reduce service at Sun Link Streetcar Stop #16177.


Carlos DeLeon, Transportation Dept Deputy Director

City of Tucson – Office of the Mayor

The Westerner Apartments project is located in the heart of downtown which is experiencing a boom of housing development with more than 1300 residential units expected to be constructed in the next two years. This affordable housing project for older persons with a preference for veterans would provide much needed affordable housing downtown to providing a better mix of market rate and affordable housing opportunities to our downtown residents.

Sincerely,

Jonathan Rothschild
Mayor
City of Tucson, Arizona